

IRELAND'S RESPONSE

To the Commission's Green Paper on the Reform of the Common Fisheries Policy



Department of
Agriculture, Fisheries and Food
An Roinn
Talmhaíochta, Iascaigh agus Bia

Cover: Shows fishing activity hot spots for Irish fleet, based on VMS data for Irish Vessels, from 2005 to 2008.

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1. INTRODUCTION

1.1 BACKGROUND

Following publication of the European Commission's Green Paper¹ on the *Reform of the Common Fisheries Policy* in April 2009, the Minister of State for Fisheries, Mr. Tony Killeen, T.D. established a steering group to oversee a consultation process with Irish stake holders, with a view to improving the operating procedures of the CFP. This consultation was under the chairmanship of Dr. Noel Cawley.

At the outset Ireland welcomes the publication of the Commission's Green Paper and acknowledges the importance of the process now in train. This process must culminate in the shaping of a strategic blueprint for the European fishing industry for the next decade. The consultation process undertaken in Ireland has concluded that substantial change in the CFP is required. In addition Ireland has developed, independently, both a national seafood development strategy and a marine research strategy which informs its position on the future Common Fisheries Policy.

Ireland now wishes to formally set out its views on a future, reformed, CFP. This present paper both summarises Ireland's view of the Commission's Green Paper and makes a number of informed recommendations that we believe must be incorporated into the current policy if Ireland's vision for seafood sector is to be delivered and, more importantly, if fish stocks and the coastal communities that depend on them are to be sustained on a viable basis after 2012.



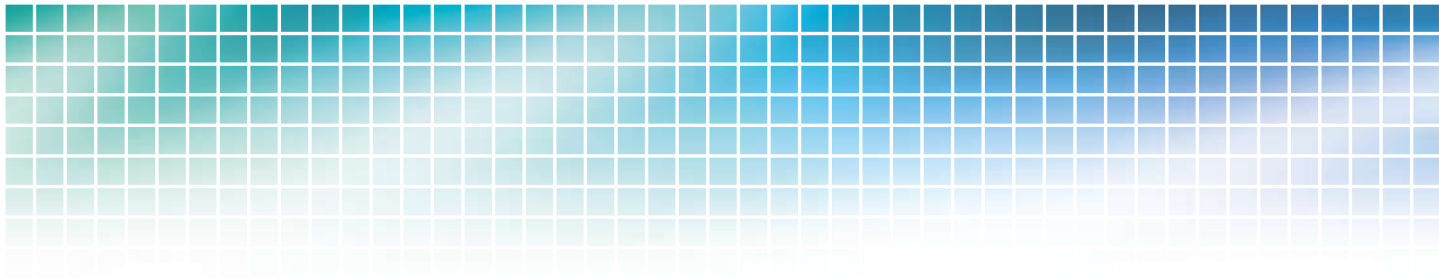
Ireland welcomes the opportunity provided by the review process to work constructively with the Commission, Member States and other Stakeholders between now and 2012 to deliver a new and workable CFP.

1.2 A SHARED VISION FOR THE FUTURE.

In 2006 Ireland carried out a comprehensive review of the national seafood sector. Recognising the difficulties experienced by the industry in recent years, this review articulated a comprehensive strategy for a restructured, sustainable, and profitable seafood industry based on the best available marine research. It also set itself the task of implementing the changes necessary to bring about that vision over the period 2006 to 2013. Ireland's strategy is contained in two, complementary reports:

- *Steering a New Course, A Strategy for a Restructured, Sustainable and Profitable Irish seafood Sector 2007-2013: Report of the Seafood Industry Strategy Review Group.*
- *Sea Change – A Marine Knowledge, Research and innovation Strategy for Ireland 2007-2013*

¹ COM(2009)163 final. GREEN PAPER, Reform of the Common Fisheries Policy. Brussels, 22.4.2009



The first of these, 'Steering a New Course' sets out a vision for a sustainable, profitable and self reliant industry that will maximise its long-term contribution to coastal communities based on fish stocks restored to sustainable levels in the context of a healthy and diverse marine environment. Essential to the achievement of this vision are:

- i) A sharp reduction in fishing capacity and effort;
- ii) More effective management and conservation of fisheries and the wider marine environment.
- iii) A much greater role for aquaculture in meeting the increased demands for seafood.

Progress has been made on delivering this strategy, including the completion of a substantial decommissioning scheme where 36% of the whitefish fleet was permanently removed from the fleet between 2005 and 2009.

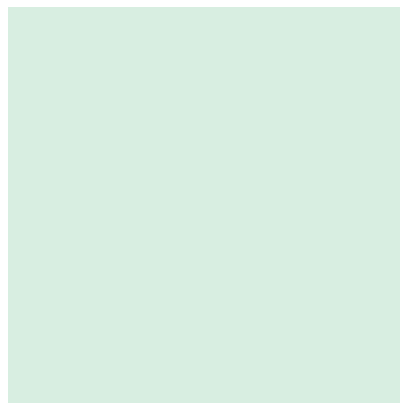
In 2006 Ireland also developed a marine research strategy 'Sea Change – A Marine Knowledge, Research and innovation Strategy for Ireland 2007-2013'. 'Sea Change' aims to ensure that Ireland fully maximises the economic, social and environmental contribution of its marine resources.

Into the future the seafood sector will be perceived as high quality and high value with a strong "Blue/Green" seafood brand.

The Sea Change vision for the fisheries resource base articulates an economically viable fishing industry that contributes to the generation of prosperity in coastal communities from a well managed and exploited resource base, informed by clear, reliable and impartial marine science and built on a foundation of strong stakeholder participation. It also sees a marine environment that can sustain and support a dynamic maritime economy built on food, energy, shipping and tourism.

The shared vision which these two Irish strategies (seafood and marine research) demonstrate is very much in line with that put forward in the Green Paper. Ireland shares the Commission's concerns about the current state of the fish stocks and recognises that significant change must be made if our shared vision is to be realised.

From an Irish perspective, the long-term priority is to have a strong, sustainable and profitable seafood industry that supports fishing and related economic activities in the coastal communities. These communities must be allowed maintain jobs in the catching, supply and processing sectors if they are to prosper. It is not just the activities of the smaller, inshore, fleets that support this vital activity; in Ireland's case the operation of family owned, locally operated, larger boats are the primary mainstay of activity in our fishing ports in many cases.





Ireland strongly supports this vision;

- i) Where fish has re-established itself as a regular fixture in the diet of half a billion European consumers;
- ii) Where the sector can meet the demand for high quality locally produced seafood;
- iii) Where the fisheries resource has been restored to maximum sustainable yields;
- iv) Where people in coastal communities once again see fishing as an attractive and stable means of making a living;
- v) Where the CFP has become streamlined and is cheaper and simpler to manage;
- vi) Where stakeholders fully participate in decisions and debates on policy implementation.

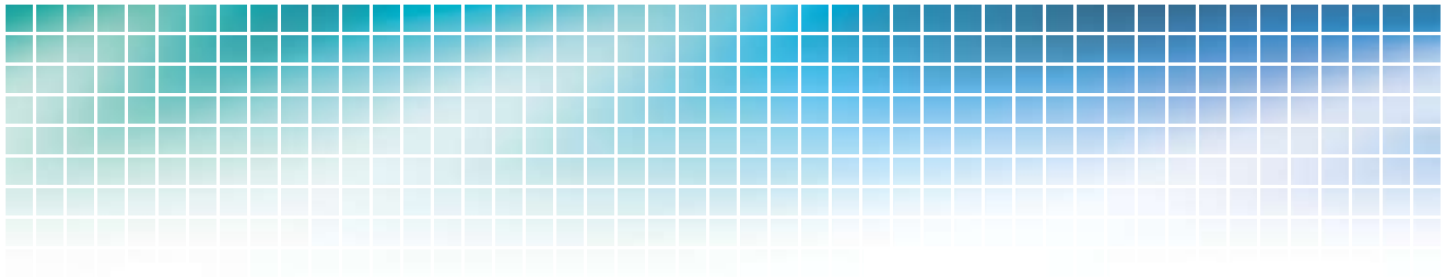
1.3 ORIGINS OF THE CFP

The Common Fisheries policy originates from the 1957 Treaty of Rome, where fisheries are considered part of the wider 'agriculture' domain. Article 3 of the Treaty, for example, specifies that 'The Community shall include 'a common policy in the sphere of agriculture and fisheries'. Article 32 (ex Article 38) explains that, 'the common market shall extend to agriculture and trade in agricultural products, where 'agricultural products' means the products of the soil, of stockfarming and of fisheries and products of first-stage processing directly related to these products. Thus the procedures laid down for agriculture in subsequent articles also pertain to fisheries; this is particularly pertinent in the context of developing a common market organisation.

At the time of drafting the Treaty of Rome, the six original Member States did not have jurisdiction over the extensive waters now defined as 'Community waters' and the need for a complex policy was significantly less than it is today. As a consequence, it might be said that the Common Fisheries Policy developed in a piecemeal fashion, and indeed it was some 26 years after the Treaty of Rome when the first complete piece of legislation, laying a true foundation for a *Common Policy*, was published. Council Regulation 170/83 had the basic purpose of 'establishing a Community system for the conservation and management of fishery resources'. Accordingly, this was the foundation from which most other fishery Regulations derived.

Other developments, in the intervening period have had a profound impact on the Common Policy seen today. In fact the first common measures date from 1970, when it was agreed that, in principle, EU fishermen should have equal access to member states' waters. However shortly after that, with the accession of Ireland, Denmark and the UK, this was overturned, to an extent, when a derogation to the principle of 'free' access in the 6 and 12 mile coastal zone was established. At the time it must be remembered that Community Waters consisted, essentially, of no more than the 6 and 12 mile coastal zone.

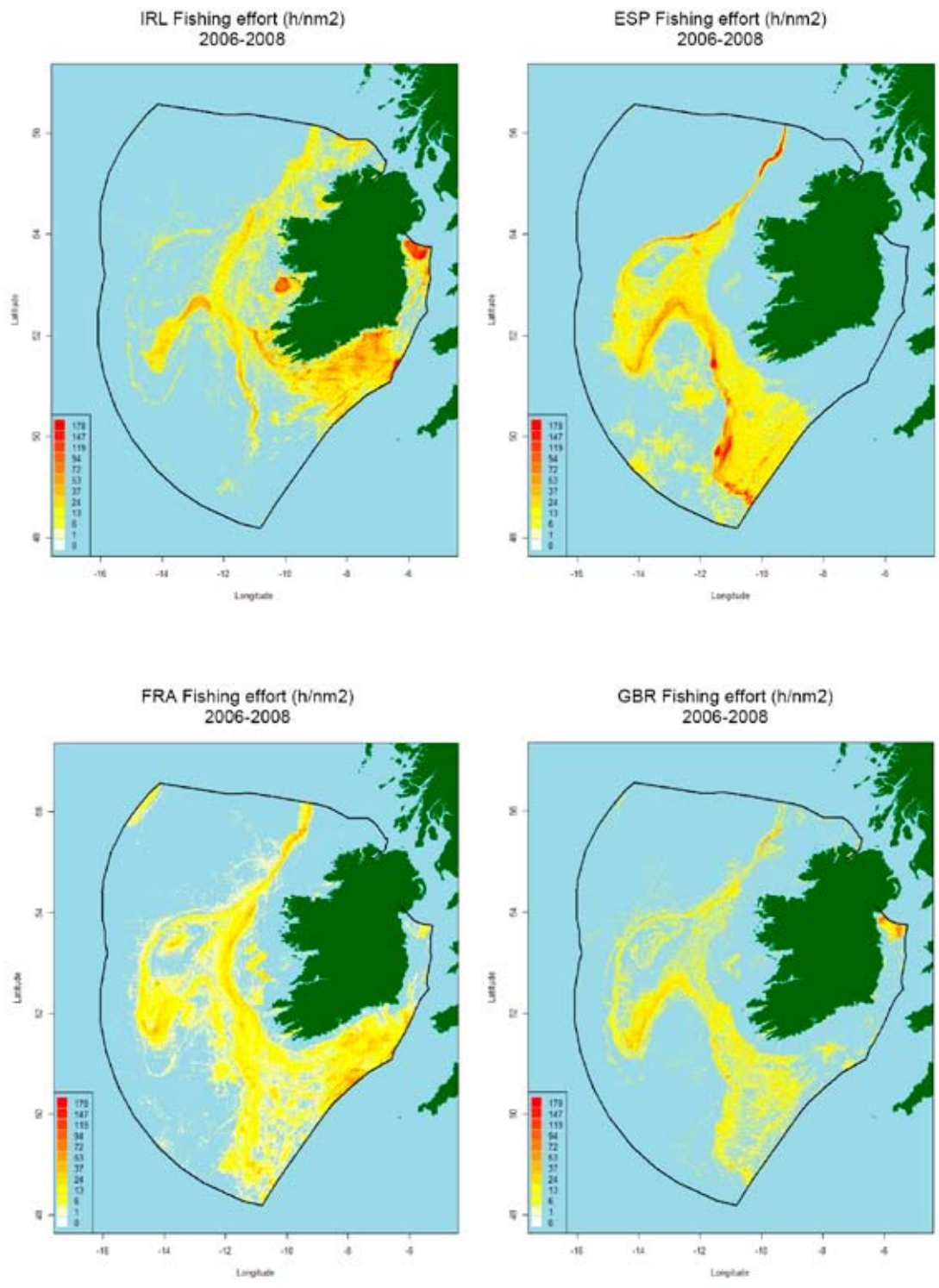
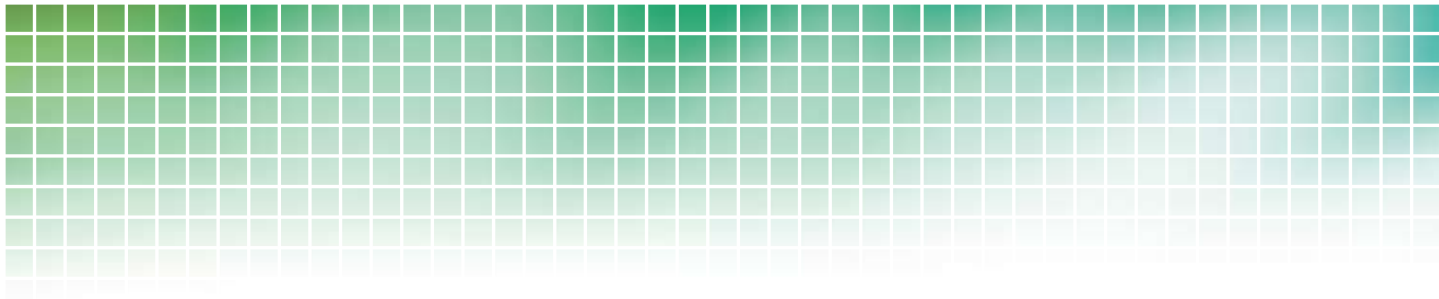
A second significant change occurred in 1976 when the Council adopted a resolution to the effect that member states would extend the limits of their fishing zones to 200 miles off the North Sea and North Atlantic coasts. Thereafter the exploitation of fishery resources in these zones by fishing vessels of non-member countries would be governed by agreements between the Community and the non-member countries concerned. Therefore in a single action the extent of Community Waters was vastly increased. More importantly the concept that EU fishermen should have equal access to these new waters was retained and benefits thus accrued to the Community rather than individual Member States.



Given the size of the area that falls within 200 miles of Ireland's North Atlantic coasts there can be no doubt that their inclusion in this action has been of considerable benefit to the Community as a whole. If Ireland had in its possession an advanced fleet at the time – like some other member states' – there can be no doubt that the national seafood sector would have benefited greatly. However, given the size and scale of Ireland's fishing fleet in the mid 1970's there can be no doubt that these potential benefits were lost. Indeed, in framing their Resolution, the Council sought to reflect this situation. Annex VII of the Hague Agreement states, that "having regard to the economic relationships which characterise fishing activity in Ireland, it (the Council) declares its intention so to apply the provisions of the Common Fisheries Policy, as further determined by the Act of Accession and adapted to take account of the extension of waters to 200 miles", in order to secure "the continued and progressive development of the Irish fishing industry".

In the early 1980's when Total Allowable Catch (TAC) and quota shares for Member States were finally established the allocation keys were based not on fundamentals like 'who has contributed most' but instead on 'who has caught – *benefited* - most'. Thus the establishment of a common access provision prior to Ireland's accession, coupled with a massive increase in the size of the Community's resource base (in large part waters within Ireland's EEZ) and finally a share out based on uptake (benefit) rather than contribution has left Ireland's fishing industry deeply aggrieved at a policy that appears to have benefited some at the expense of others.

Ireland's 200 mile exclusive fishery zone contains some of the richest fishing grounds in EU waters and is extensively fished. A summary of the fishing effort of Ireland, Spain, France and the United Kingdom is set out overleaf.



Irish, Spanish, French and UK effort in the Irish EEZ 2006 to 2008 inc.
Source: VMS database.



2. CURRENT STATUS OF EUROPEAN FISH STOCKS

2.1 THE CURRENT STATUS OF FISH STOCKS IN THE WATERS AROUND IRELAND

Ireland stresses that fish stocks are the bedrock of the seafood sector and their good status and sustainable exploitation are central to the realisation of the vision Ireland has set for its seafood industry.

Ireland recognises that most fish stocks are fished to a point where their productivity² is less than it could be. This does not imply that all are in imminent danger of collapse. Some stocks have been fished at unsustainable levels and have collapsed; others have been fished at moderately high levels for decades yet maintain stable levels of catches whilst still others have been fished at low levels, or intermittently, but are unstable because of normal environmental effects on recruitment. Generic statements on the state of the fisheries resource can be misleading. For this reason, Ireland provides a summary of the general state of the fisheries resource in the waters around Ireland.

2.1.1 Demersal Stocks

The Northern hake stock has rebuilt following the application of a stock recovery plan, which has seen fishing pressure decline over the past decade. Anglerfish, megrim and Celtic Sea haddock stocks are also stable, although these should not be subjected to any increases in fishing pressure. There are a number of other demersal stocks that are severely depleted and cause concern. In broad terms, almost all of the demersal round fish stocks, in particular cod, haddock and whiting need to be rebuilt to some degree, although the extent of this is area-specific. As an example, while Irish Sea and Rockall haddock are doing well, haddock stocks to the West of Scotland have fallen beyond desirable levels and almost all the cod stocks around Ireland are severely depleted and catches are well below historic levels. Both Irish Sea and West of Scotland cod stocks have been the focus of recovery plans for the past decade. Despite the introduction of these, there have been little signs of improvement. Similarly, whiting stocks in these two areas are also severely depleted and suffer from high levels of discards. Most flatfish, with the exception of Irish Sea plaice, are below desirable levels and fishing pressure should be reduced in order to rebuild them.

2.1.2 Pelagic Stocks

Pelagic stocks such as herring, mackerel and horse mackerel show varying trends. While horse mackerel and mackerel stocks are in good shape, the recent catches of mackerel in excess of the agreed TAC by third countries are likely to increase fishing to undesirable levels.

The picture of herring stocks around Ireland is varied. The Celtic Sea stock has recovered from the low levels seen in the early part of this decade, and is now subject to an industry-led rebuilding plan. However herring to the north west of Ireland is depleted and needs to be rebuilt.

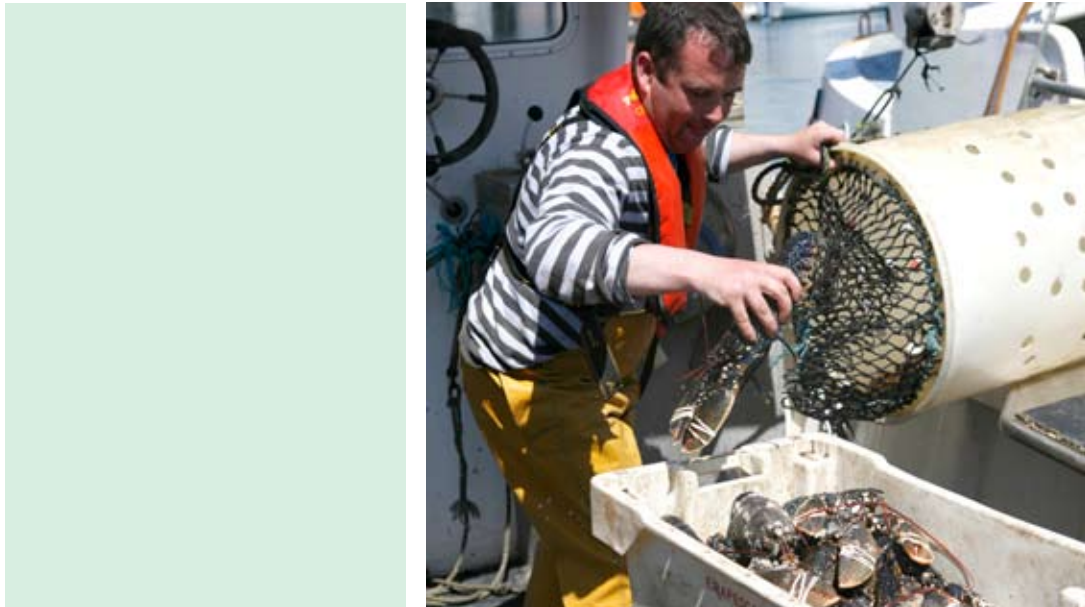
The blue whiting stock has been at a very high level for much of the last decade but is now declining.

2.1.3 Shellfish Stocks

Prawn (*Nephrops*) stocks around Ireland are stable with the exception of the Porcupine stock, which is in danger of collapse. Brown crab, lobster, shrimp, whelk, scallop, cockles and clams are important shellfisheries in waters around Ireland.

Generally the size of these stocks or their potential yields is not estimated but other indicators are used to assess their status. Brown crab stocks are stable in Sub-area VI but catch rates may be declining in Division VIIj (south west coast) and biomass in all areas is lower than in the 1980s.

² Their capacity to increase biomass through growth and reproduction.



Lobster stocks vary according to area; some stocks may be in decline while others have recently increased. The productivity of lobster stocks could be higher if spawning potential was increased through technical measures or control of fishing mortality. Whelk stocks have not been assessed recently. Scallop stocks, which occur mainly off the south east coast, may be under-fished as effort has declined significantly in recent years. Shrimp stocks vary annually but there is no evidence of any long-term trend. The biomass of cockle and clam stocks is assessed annually and these fisheries are subject to annual management plans which limit exploitation to a percentage of biomass.


2.2 CONSERVING AND RE-BUILDING FISH STOCKS FOR FUTURE SUSTAINABILITY

Ireland has a strong commitment to delivering the healthy fish stocks essential to providing the net benefit critical to Ireland's sea fishing sector and dependent coastal communities. It is clear, however, that should these stocks be allowed to decline further, the benefit will quickly fall into negative balance. This is especially true when account is taken of the high cost of the national administration required under the current policy and, particularly, when the significant cost of controlling the extensive fishing grounds inside Ireland's Exclusive Fisheries Zone is included.

Ireland is strongly of the view that this strategic balance – the cost benefit to the Member State and the coastal communities therein – will be fundamentally and negatively impacted should new systems be introduced that promote the sale of fishing opportunities and quotas at international level, for example ITQ's.

2.2.1 Discarding

Ireland recognises that discarding is a major issue in European fisheries that must be addressed in a reformed CFP as a high priority.



The complex problem of discarding is not new but has been a feature of European fisheries almost from the inception of the CFP; nor has there been any real success confronting and resolving it. The most recent measure of discarding was carried out in 2005 by the FAO who estimate that worldwide discards, by weight, amount to 8% of catches. Based on this, yearly average discards in the 1992 – 2001 period are estimated to be some 7.3 million tonnes, for an average yearly marine catch of 83.8 million tonnes. In the case of the north east Atlantic, however, some 1.3 million tonnes of fish – equivalent to 19.6% of the total – are discarded, while landings only account for 11% of worldwide landings. FAO attributes the high level of discards in the north east Atlantic to EU fisheries. Recalling discards worldwide amount to 8%, discard rates in the waters west of Ireland and Scotland vary between a staggering 31% and 90%.

Ireland recognises that there are many forms of discarding. These include over quota species, undersized and juvenile animals, high grading, unmarketable species and other unwanted marine inhabitants. The reasons for discarding are both legislative (individuals less than minimum landing size; catch in excess of quota) and economic (commercially less valuable species are discarded to keep storage space for higher value fish) and in many cases both reasons operate simultaneously.

Whilst discarding of adult fish does occur (catch in excess of quota) with the obvious consequences for commercial viability, the overwhelming majority of fish discarded are dead and the bulk of these are fish much smaller than the maximum size to which they might otherwise have grown. In addition, these undersize fish are, usually, sexually immature. Thus discarding inevitably means that future spawning stock biomass (stock size) is constantly being eroded in many European fisheries. Further, should discarding reach a sufficiently high level – and this is not unknown in European fisheries – then the spawning stock biomass may be reduced to a point at which it cannot replenish the stock, and the stock will then collapse. The economic consequences are obvious; profits are smaller than they would be if the fish were allowed to grow in the sea, reproduce, and caught at a larger size.

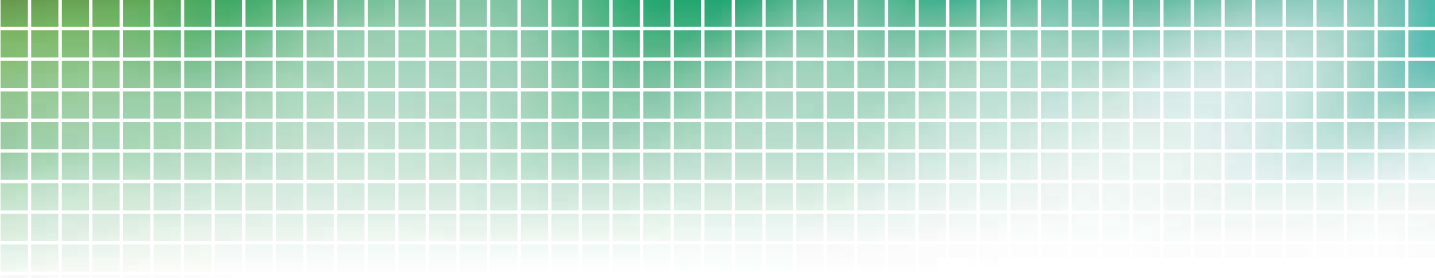
Ireland would stress that a key element to achieving sustainable fisheries, avoiding waste, and making the best use of harvested resources, is to gradually eliminate discarding. Discarding, however, is a complex issue;

- The impact of discarding on the wider ecosystem remains poorly understood. Some seabirds, for example, are believed to have increased in abundance through augmenting their food supply with discards. All of these factors must be considered and balanced in any new policy.
- It will not be possible to reduce discarding significantly by applying one or two simple rules. The complexity of the problem requires action on several fronts.

While discarding practices tend to be very fishery specific, a large amount of discard data has now been collected from Community fisheries through the Data Collection Framework³. There is an urgent need to carry out a comprehensive analysis of these data sets and produce an atlas of discarding in EU fisheries. This will identify the location and extent of the problem and inform remedial actions that should then be selected from a “toolbox of measures” that are fishery specific. Such a toolbox will include the use of gears and mesh sizes that reduce or eliminate discarding of juvenile fish; closed areas that protect juveniles; measures that reduce bycatch of unwanted species – including non fish species, cetaceans etc; and stringent measures to eliminate high grading.

Ireland does not support the concept of landing all discards from all fisheries. This could create even greater environmental problems and would subject the industry to unreasonable demands. However, Ireland would support a discard ban for stocks in a much depleted state.

3 EU Council Regulation 199/2008



In those cases where a complete ban might be appropriate (for example a cod discard ban in certain cod and/or mixed fisheries), the system must ensure that any mandatory landing of previously discarded fish (in this case, cod) does not financially penalise nor profit the fisherman concerned.

Ireland would also suggest that more innovative thinking needs to be applied to this serious problem. There might, for example, be a requirement that fishing vessels depart grounds where high quantities of small fish are being caught. Furthermore, the use of incentives to promote responsible behaviour should be introduced. One option that could be explored would involve adherence to Codes of Practice by fishermen who would, in turn, be rewarded with an increased quota allocation.

Ireland supports such a system where a Code of Practice, particular to an area/fishery, and based on voluntary participation, is seen as a long-term investment by the Community in the promotion of responsible fishing. Such a code would cover a number of good practices; discard reduction through the use of environmentally friendly fishing gear; product quality enhancement; participation in fish surveys and self sampling; waste management; and the development of vessel specific, environmental management systems. Such schemes would be run, not by the Community or Member State, but by Producer Organisations on behalf of the Industry, but would be subject to audit by an independent body. An additional quota of, say, 10% of a TAC would then be set aside for Member States who operate these systems with the bonus quota made available to vessel owners who comply with the Code.

Ireland would stress that the gradual elimination of discards is dependent on a strong industry, science, gear technology partnership particularly when it comes to identifying problem fisheries and implementing effective remedial actions. The Regional Advisory Councils (RAC's) are a key forum for this partnership.

2.2.2 Ecosystem Approach to Fisheries Management

The Ecosystem Approach to Fisheries Management (EAFM) is an integral part of many international agreements as well as the 2002 reform of Common Fisheries Policy. It encompasses the management of fisheries within the context of the whole ecosystem and involves working closely with stakeholders, managing fisheries to limit their impact on the ecosystem, preserving the ecological relationships between species, and introducing governance that ensures both human and ecosystem well being and equity.

Ireland recognises that working with stakeholders, limiting the impacts of fisheries, developing area based management objectives, and implementing and reviewing area based management plans are all integral parts of the Ecosystem Approach.

Ireland strongly supports the establishment of area based management plans that embrace the Ecosystem Approach.

Multi-annual management plans would, in the first instance, be brought forward by the Commission in association with relevant Member States and stakeholders and be based around delivering on objectives set by Council/Parliament. Implementing arrangements would, in turn, be adopted by the relevant Member States in association with stakeholders but subject to oversight by the Commission. For example, an area based management plan for the Irish Sea would identify and map the major biological features in the Irish Sea (e.g. sensitive habitats) and set objectives for the fisheries (e.g. eliminate discarding; rebuild stocks). It would examine the fishing activity and the impacts of the fisheries on the biological features (e.g. the use of more environmentally friendly fishing gear); develop management plans that reduce the impacts of the fisheries and routinely review the management objectives and plans.

Ireland considers the Ecosystem Approach to Fisheries Management as a critical regional management solution, which can be implemented by Member States, subject to Community Standards and control, and involve a greater role for the Regional Advisory Councils.

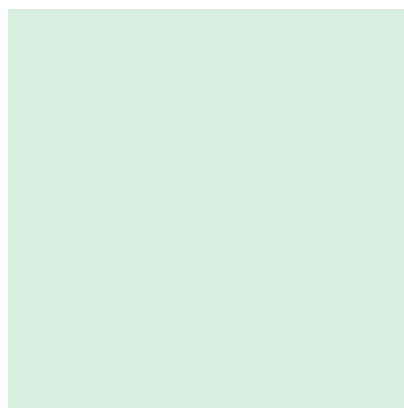
2.2.3 Maximum Sustainable Yield

At the World Summit on Sustainable Development (WSSD) in Johannesburg in 2002, EU Member States committed themselves to maintaining or restoring fish stocks to levels that can produce Maximum Sustainable Yields (MSY) no later than 2015. MSY was also part of the 1995 UN fish stocks agreement. The philosophy behind this approach is to obtain the maximum long-term catch, whilst simultaneously ensuring the stock size is kept large enough to maintain productivity.

Ireland accepts that the MSY commitment entered into by Member States must be recognised for the purposes of fish stock management in the future CFP. However Ireland would stress that the transition from the current management framework to a framework based on MSY should be on a phased basis probably beginning with the scientific advice in 2010.

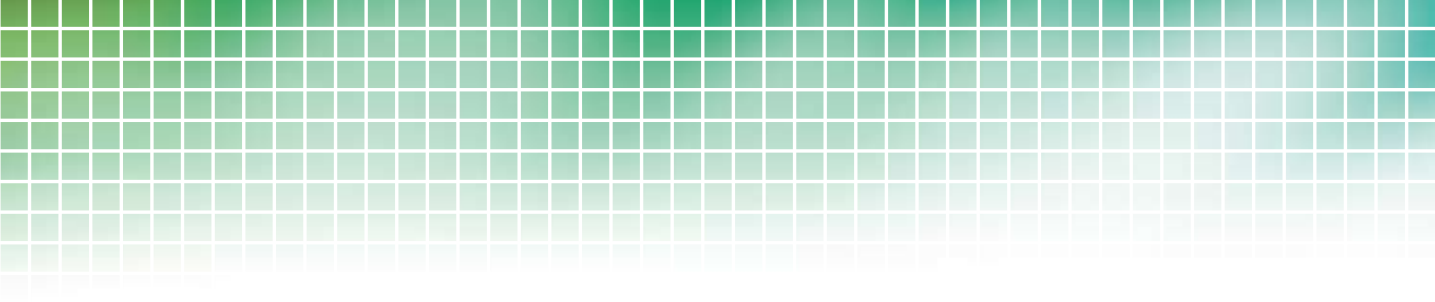
The implementation of any new MSY framework must be managed on a rational basis over an appropriate time frame so that substantial cuts to TACs are progressively introduced over a multi-annual period. In this context Ireland recognises that the transition to MSY will have socio-economic impacts - through reduced catching opportunities in the short-term - and that benefits will only be realised in the longer term through more stable and sustainable fisheries.

Ireland would point out that there are still considerable implementation issues with MSY (e.g. defining MSY for 'data-poor' stocks; MSY for mixed fisheries situations) and that these need to be resolved in an open and transparent way. In particular, the implementation of MSY in mixed fisheries needs substantial work to ensure that it is balanced and appropriate and does not unnecessarily undermine the livelihoods of fishermen and coastal communities' dependant on fishing - particularly in the short-term.



2.3 KNOWLEDGE, DATA AND SCIENTIFIC ADVICE

It is widely recognised that our understanding of the social and economic aspects of Community fisheries policy lag far behind the emphasis placed on the biological aspects of fisheries. Ireland strongly supports a new impetus to improve social and economic studies particularly in relation to the social and economic impacts of management plans.



Ireland is of the strong view that scientific knowledge, data, and credible and reliable scientific advice are of vital importance to the CFP. Policy decisions must be based on robust and sound scientific advice on the level of exploitation that stocks can sustain, of the effects of fishing on marine ecosystems and on the impacts of climate change.

Ireland recognises that scientific advice has been a source of friction and distrust between science and industry in the past. In recent years the situation has improved, particularly with the introduction of the Regional Advisory Council (RAC's). Ireland strongly supports increased transparency in the scientific advisory process, through increased stakeholder participation and through the capture and use of fishing industry knowledge. Industry and science must work together in a spirit of mutual co-operation and trust in order to capture and use this valuable knowledge to improve scientific advice. This will greatly benefit buy in to the workings of the CFP.

Ireland supports the building of an integrated data capacity and knowledge management system across Europe to inform the policy decisions of the CFP. Ireland emphasises the need for Member States to deliver on their responsibilities under the Data Collection Framework (EU Council Regulation 199/2008) and to collect and make available the data needed to support the CFP.

Ireland believes that we must increase our understanding of the life history, ecology, socio economics dynamics and ecosystem role of fish stocks through focused research projects and that these projects should be funded at a Community level. Too often in the past, research projects have gathered dust on many shelves and Ireland would stress that the results of research projects must be disseminated more effectively to stakeholders - in a user friendly format - and must be used to improve the scientific advice that supports the CFP.



3. MANAGEMENT OF EUROPEAN FISH STOCKS

3.1 RELATIVE STABILITY

The primary tool for the management of fisheries under the Common Fisheries Policy is the establishment of annual TACs and quotas based on the principle of Relative Stability. Ireland believes that Relative Stability and its attendant TACs & Quotas, whilst imperfect, must remain the primary community mechanism to manage fish stocks.

3.1.1 Total Allowable Catch and national Quotas

Ireland firmly believes that, while imperfect, the TAC and quota system must remain the bedrock of access to fishery resources in the Common Fisheries Policy. Irish fishermen – and the wider Irish public - remain deeply aggrieved at the discrepancy between the volume of fish which Ireland contributed to the CFP (through its large and productive 200 mile exclusive economic zone) and the share of fish stocks it has received through the CFP. However, Ireland advocates that adjustments can be made to the present share out (relative stability) of a number of white fish and pelagic stocks so that the future allocation of Community resources is better adjusted to match today's needs and is seen to deliver increased shares of stocks adjacent to shores for coastal Member States through a range of mechanisms including the improved use of swaps.

3.1.2 Quota Management

Ireland strongly opposes any attempt to introduce an ITQ management system at European level and will not support any arrangement that leads – either directly or indirectly - to privatisation of national 'public resource' fish quotas.

Any CFP changes leading to international transferability of national quotas by private operators would directly reduce the benefit of quotas to the coastal state to which they were granted and be detrimental to the operation of Ireland's fishing industry which is mostly family owned. This undermining of the traditional fishing sector in Europe would immediately bring about irreparable damage to the coastal communities that have for generations depended on fishing.

Ireland states clearly that an enforced ITQ or similar system will result in the concentration of resources into the hands of large corporations which will have no link with the coastal communities' dependant on fishing.

Ireland as an island nation with vibrant coastal communities dependent on fishing, strongly favours policies that deliver and sustain jobs in these communities rather than the concentration of opportunities, wealth, and delivery of excessive profits for a few big international businesses. Ireland favours a system which maintains strong economic links between national quotas and the traditional fishing communities which these quotas were allocated to assist.

Ireland strongly supports the maintenance of the current policy where national quotas are 'owned' by the Member States and responsibility for their management is retained by the Member State.

Ireland sees little benefit for European coastal communities in a system that would lead to rapid concentration of ownership in a small number of multi-national companies with weak links to traditional Irish fishing communities.

3.1.3 Retaining unified treatment of fleet

Ireland believes that the Commission's proposal to differentiate fishing opportunities between large and inshore vessels will result in the concentration of the bulk of resources in large companies. As a consequence inshore vessels and coastal communities will, over time, be starved of fishing opportunities.

In Ireland, as in other parts of Europe, most of the larger pelagic and whitefish trawlers retain strong economic links with local processing companies and coastal communities. The creation of a large, international, 'European' industrial fleet will be highly detrimental to traditional coastal communities currently dependent on local fleets.

Ireland's strong position is that quota and effort management arrangements must strictly remain a devolved responsibility for the Member State.

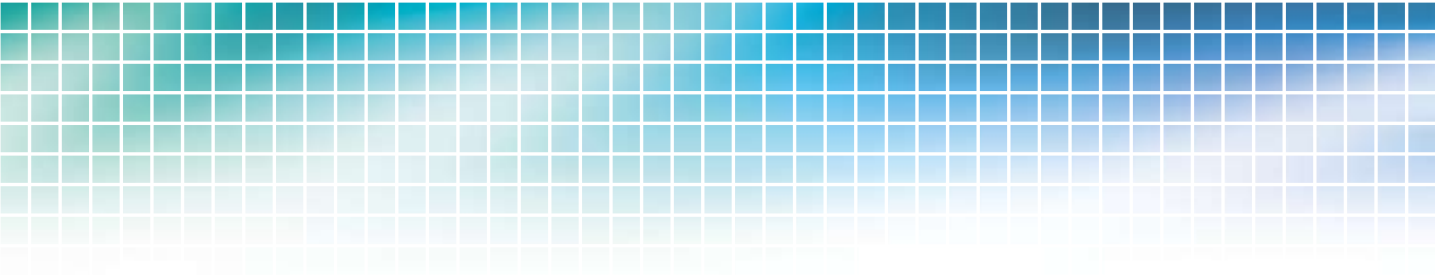


3.1.4 Effort management as a replacement for TACs & Quotas

While Ireland remains dissatisfied with the share out of TACs, it does not believe that a move to an alternative 'effort' based regime would deliver a more equitable allocation arrangement. On the contrary the discrepancies apparent in the current system would, in all probability, be exacerbated. In addition, a management model that relies solely on fishing effort does not indicate any greater protection for fish stocks; On the contrary there is a serious risk that unless the number of days is severely limited or fishing fleets are substantially reduced, the catch of key commercial stocks would be much higher than at present and could lead to stock collapse. Attempting to use fishing effort as the primary conservation tool to effect recovery in mixed fisheries with polyvalent fleets is far too blunt as a management tool to effect recovery of a target fish stock without doing long-term damage to the fishing industry and coastal communities dependant on the range of fish stocks in that area.

Ireland believes that in limited circumstances effort restrictions are an appropriate tool but only as part of a management regime that derives primarily from TAC and quota limits. These would involve setting a ceiling on activity levels as a secondary support to the more detailed TAC and quota regime.

Ireland accepts that effort restrictions, in combination with TACs and quotas, may be necessary in certain limited circumstances to rebuild seriously depleted stocks. Ireland considers that where recovery plans are required these should be developed to take account of the specificities of each fishery in close association with stakeholders, and that recovery should be delivered using a range of measures, including technical conservation measures, to promote recovery and rebuilding of the stock.



Ireland strongly supports the continuation and strengthening of the effort ceilings within Western Waters and the Biologically Sensitive Zone. These general framework ceilings are essential to protect against the displacement of fishing effort into the rich fishing, nursery, and spawning grounds off the Irish coast.

3.2 HAGUE PREFERENCES

At its meeting on 30 October 1976 in The Hague, the Council adopted and formally approved on 3 November 1976 a resolution to the effect that as from 1 January 1977 the member-States would, by means of concerted action, extend the limits of their fishing zones to 200 miles off their North Sea and North Atlantic coasts and that as from the same date the exploitation of fishery resources in these zones by fishing vessels of non-member countries would be governed by agreements between the Community and the non-member countries concerned.

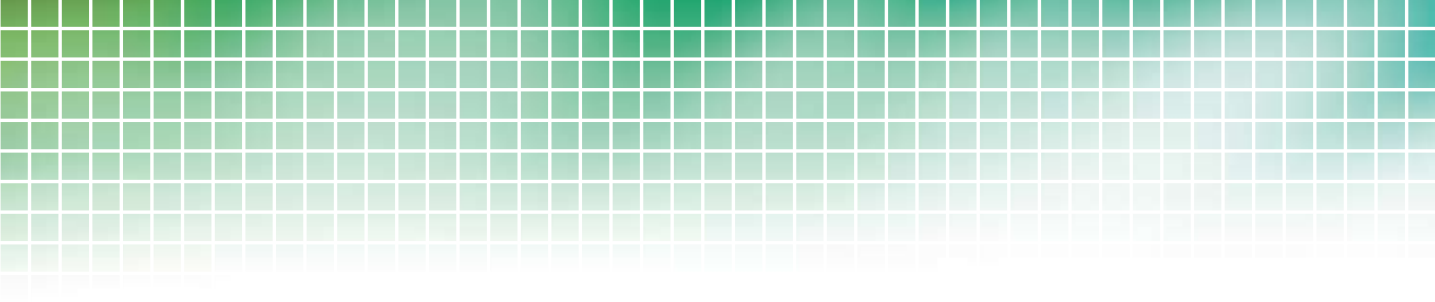
Given the size of the area and the rich fishery resources of the waters that fall within 200 miles of Ireland's North Atlantic coasts there can be no doubt that their inclusion in this action has been of considerable benefit to the Community as a whole. In framing their Resolution, the Council sought to reflect this. In particular Annex VII states, that "having regard to the economic relationships which characterise fishing activity in Ireland, it (the Council) declares its intention so to apply the provisions of the Common Fisheries Policy, as further determined by the Act of Accession and adapted to take account of the extension of waters to 200 miles, as to secure the continued and progressive development of the Irish fishing industry". It is noteworthy that other areas also benefited from this approach including the northern part of the United Kingdom and Greenland.

Annex VII to the Hague Resolution has been specifically mentioned in the Common Fisheries Policy – as part of the Regulation dealing the conservation and sustainable exploitation of fisheries resources; one of the three pillars of the policy – since the first such regulation in 1983. Thereafter it has been retained in each of the revised policies in 1992 and 2002 as follows:

Council Regulations 170/83, 3760/92: *"Whereas, in other respects, that stability, given the temporary biological situation of stocks, must safeguard the particular needs of regions where local populations are especially dependent on fisheries and related industries as decided by the Council in its resolution of 3 November 1976, and in particular Annex VII thereto"*.

Council Regulation 2371/02: *"In other respects, that stability, given the temporary biological situation of stocks, should safeguard the particular needs of regions where local populations are especially dependent on fisheries and related activities as decided by the Council in its Resolution of 3 November 1976, on certain external aspects of the creation of a 200-mile fishing zone in the Community with effect from 1 January 1977, and in particular Annex VII thereto"*.

- It is noteworthy that in each of these regulations the inclusion of a references to Annex VII is explicitly linked to the "sense that the notion of relative stability aimed at should be understood"; that is, the Hague Resolution and, in particular, Annex VII form part of 'Relative Stability'.
- Furthermore in a subsequent communication from the Commission to the Council, the manner in which the meaning of Annex VII would be given effect was further detailed; that is Ireland would be insured a doubling of its 1975 catch.
- In each year thereafter, and for those stocks, wherein Ireland's share would be less than the reference levels determined by relative stability, Ireland has sought and traditionally obtained an appropriate adjustment to the base key (applicable when Ireland is awarded a quota greater than its Hague preference).



Annex VII of the Hague Resolution and its practical implementation, the Hague Preferences, derive from a firm resolution of the Council; form an integral part of Relative Stability; this has been restated in successive Council Regulation in 1983, 1992 and 2002.

The application of the Hague Preferences has been a part of the final calculation of Ireland's share of a number of stocks in successive years since 1987.

The Hague Preferences are not unique to Ireland but have similarly been applied by the other Member State allocated a preference.

The methodology by which final allocations for the affected stocks is arrived at was established by the Commission prior to the first invocation of the Hague Preference and has remained, unaltered, year-on-year thereafter.

In short, Ireland only assented to the unanimous Community agreement required to create the new 200 mile zone which created the theatre for the operation of the developing CFP in return for the specific provisions set out in Annex VII of the Hague Resolution, which all Member States agreed to. It is not possible to re-open or diminish the principles set out in Annex VII of the Hague Resolution without re-opening the whole issue of access within the 200 mile Exclusive Fisheries Zone.

Ireland fundamentally maintains that any revision of the CFP should, alongside the retention of Relative Stability, also provide that the Hague Preferences, as traditionally applied, be given permanent automatic entitlement.

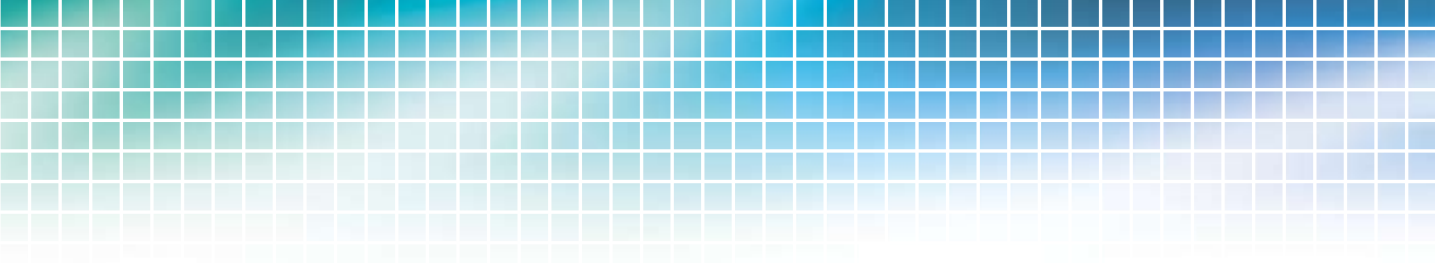
3.3 IMPROVING RELATIVE STABILITY THROUGH INCREASED FLEXIBILITY

The allocation of quotas in the current system of relative stability is based, in large part, on management areas that were established almost 30 years ago. In some case these are contiguous with management areas used by scientific advisory bodies and reflect natural (biological) grouping. In other cases this is not so. Thus, for example, in the waters around Ireland we have just one management area for hake (including ICES areas VI and VII; EC waters of Vb and international waters of XII and XIV) with a total TAC in 2010 of 30,900 tonnes. Conversely, for common sole we have no fewer than five management areas with four for ICES area VII alone. In two of these management areas the TAC is 61 and 45 tonnes respectively. There is a clear need for a major review of current management areas and in this context it is noteworthy that recently a number of management areas have been successfully changed bringing them more into line with biological stock definitions and current fishing practices.

3.3.1 Mini-Quotas, Discarding, and Coastal States Preferences

Another problem associated with relative stability are the so called 'mini quotas'. While these allocations may reflect catch history in the 1970's, today they are very small quotas in often distant fisheries. In many cases fleets steam many miles (incurring significant carbon foot prints) to catch small allocations in fisheries where they may or may not also have quotas for other stocks caught in mixed fisheries.

Given their size it is evident that it is not commercially viable to catch these quotas; indeed many of them are economically unsound and should be redistributed to Member States in a position to utilize them.



In its Green Paper, the European Commission contends that relative stability contributes to discards because it creates many national quotas that generate their own discarding constraints: one national fleet may not have exhausted its quota for a certain species but another national fleet which exhausts its quota, or has no quota at all, is forced to discard it. In the case of mini-quotas, Member States with a small quota for a certain target species but no quota at all for the other species caught in a mixed fishery are also forced to discard large quantities of fish. Clearly there is a need to revisit some of the traditional allocation keys of relative stability and to introduce a measure of flexibility in others as part of a wider review of the Community policy on discarding.

3.3.2 The focus on increasing TACs

In its Green Paper, the European Commission contends that relative stability is one of the key reasons that has led national administrations to focus almost exclusively on increasing TACs, and thereby their share of fish, at the expense of other longer term considerations. Yet recent experience has shown that where appropriate fishery management plans, with suitable harvest control rules, are agreed in advance this problem all but disappears. Rather than dismantle relative stability or replace it with, for example ITQ's or effort management alone, the main lesson arising from history and practice is the need to accelerate the pace of management planning as part of an overall review of how relative stability is applied.

3.4 ACCESS

3.4.1 Coastal waters

Ireland is of the view that Member States coastal waters should be reserved for their national fleets in order to secure a future for coastal, inshore, and recreational fishermen taking fully into account the particular situation of their small and medium sized enterprise. Furthermore, coastal waters are sensitive habitats for juvenile fish species and are subject to a large range of human impacts including coastal pollution, tourism and leisure activities. Ireland recognises that many small scale coastal fisheries have limited environmental impact. In certain cases however, aggregated impact can be significant with real consequences for stocks and sensitive coastal habitats.

Ireland considers that further consideration should be given to an extension of the 6/12 mile limit to 10/20 miles whereby the access rules currently applicable to the 6 mile zone will be extended to 10 miles and the rules for the 6-12 mile zone will be applicable in the 10-20 mile zone. Furthermore, any such extension would facilitate the introduction of management measures including restrictions on the type and intensity of fishing activity within the zone in order to protect local coastal communities' dependant on inshore coastal fisheries.

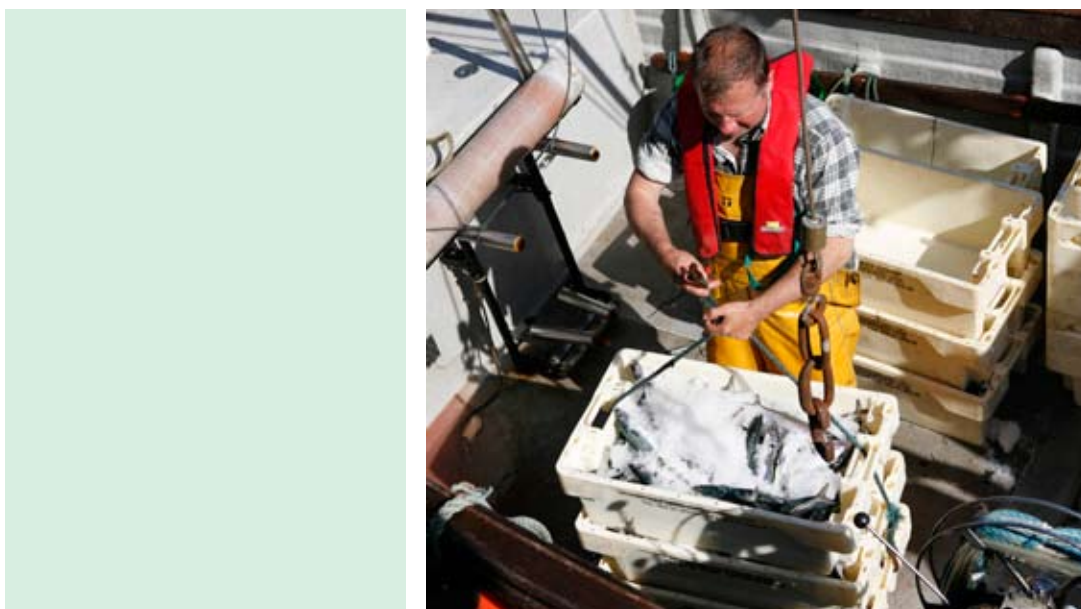
Ireland also believes that Member States must develop integrated coastal management plans. These plans could be developed separately for the inner (currently 0 – 6) and outer (currently 6 – 12) zones, involve strong stakeholder engagement and be based on the ecosystem approach to fisheries management.

In order to support indigenous island communities with strong fishing traditions (e.g. the small islands off the west coast of Ireland), Ireland considers that such communities should be supported in developing local management plans for the fisheries on which they are dependent.

These plans should include preferences - in terms of access and fishing opportunities - for these communities and also involve support for the development of niche processing and marketing arrangements.

3.4.2 Biologically Sensitive Area

The Biologically Sensitive Area (BSA) is situated off the west and south coasts of Ireland and is considered to nest within an area of high biological sensitivity. It contains important spawning and nursery grounds for exploited north east Atlantic fish species. The Biologically Sensitive Area was established under Article 6 of Council Regulation 1954 of 2003 and replaced the 'Irish Box' set up under the Iberian Act of Accession of 1986. Its primary intention is to ensure that the level of fishing intensity in this vulnerable area does not increase. It is noteworthy that the area of the Biologically Sensitive Area, comprising parts of ICES sub-areas VIIIb, VIIg VIIj and VIIIh, is substantially smaller than the Irish Box.



Ireland stresses that there is clear scientific evidence that the Biologically Sensitive Area contains important spawning areas and nursery grounds for exploited north east Atlantic fish species. It is particularly important for the northern hake stock and is subject to high levels of fishing activity by vessels from Spain, France, Ireland and the UK.

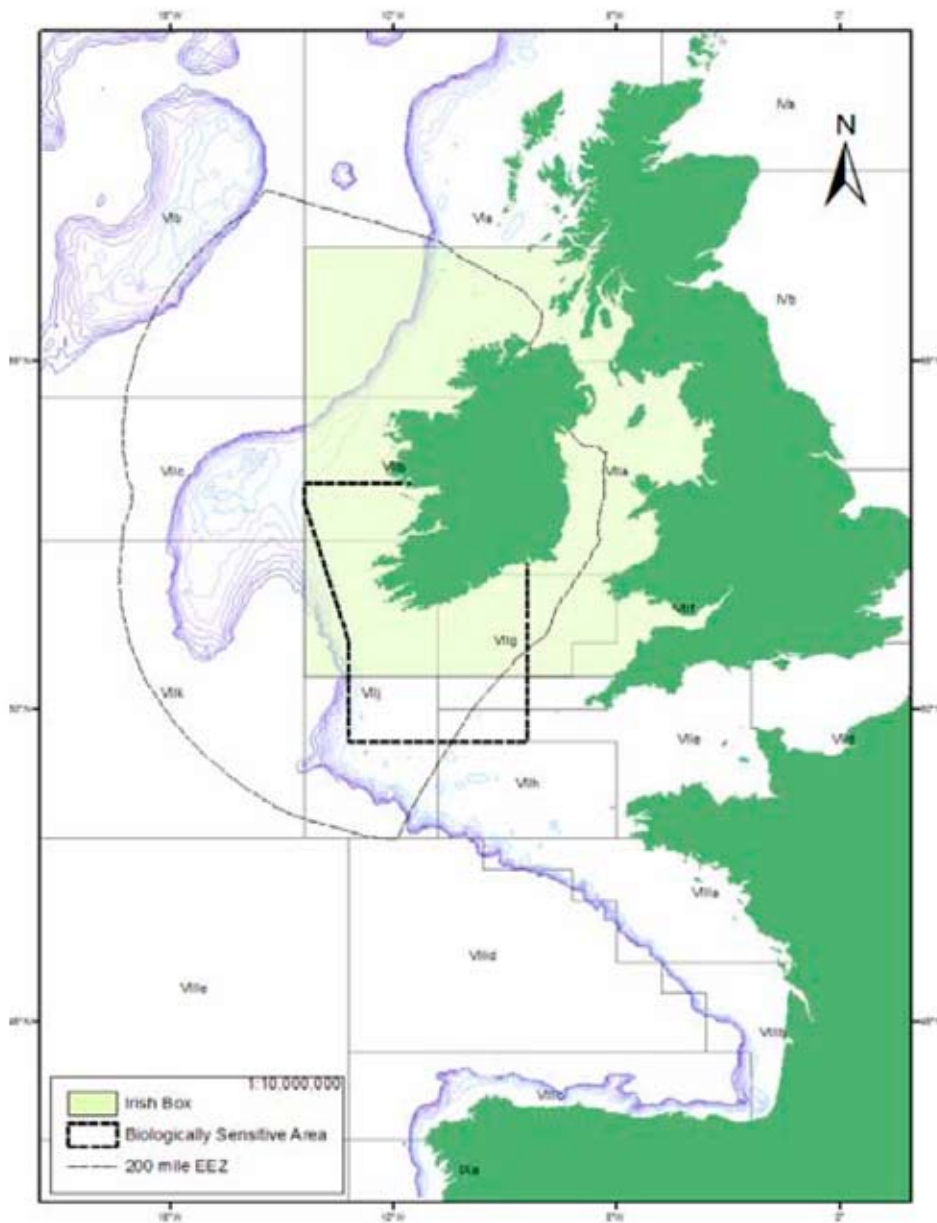
Several attempts have been made to evaluate the utility, functioning and effectiveness of the Biologically Sensitive Area. In 2009 however, the Scientific, Technical and Economic Committee for Fisheries (STECF) and ICES were unable to conduct the required analyses due to incomplete data sets.

ICES have stated in their latest scientific advice (ACOM; June 2009) that the Western Waters regime (and other EU measures) have helped stabilise hake fishing mortality since 2001. However, they also state that the effects of these measures cannot be precisely quantified.

Ireland emphasises the importance of the Biologically Sensitive Area for hake spawning and hake juveniles. If the area is dismantled, it would lead to increased fishing pressure in a biologically sensitive region.

Ireland firmly believes that the Biologically Sensitive Area must be retained and a regional management plan(s) developed for its future management.

The first step in formulating such a plan(s) will be the setting of agreed management objectives – agreed with appropriate Member States and stakeholders - followed by the formulation of Management Plan(s) that build on the biological features of the Biologically Sensitive Area. These Management Plan(s) must focus on the continued rebuilding of the hake and other stocks through protection of juvenile and spawning areas (using, for example, seasonal closures) and on the gradual elimination of discarding (using, for example, gear modification and seasonal closures). This approach is in line with the regional management concept outlined by the Commission in the Green Paper. The continuation and strengthening of the Biologically Sensitive Area is absolutely necessary to deliver effective conservation of the important spawning areas and nursery grounds in this area.





4. TRADE AND MARKETS

Fishermen in recent times have faced increased costs from rising fuel prices and declining fish prices. There can be no doubt that part of the decline in fish prices returning to producers is directly and substantially caused by competition from imports of both wild and farmed product. The producers of these products are not subject to the demanding regimes that are required of EU operators in areas such as conservation, hygiene standards etc and can therefore enter the EU market at prices that are uneconomic for European operators. This situation is not acceptable and must be addressed as a priority through a range of measures.

The EU Regulation on the Common Organisation of the Markets in Fishery and Aquaculture products (Regulation 104 of 2000 – the CMO) is intended to provide market stability, to ensure a stable supply of quality products, to guarantee a fair income for producers and ensure a fair price to consumers. The Green Paper recognises that first sale prices for fish have been declining and catchers often receive only a small share of the price the consumer pays for the fish at the counter.

Ireland considers that there is a need to substantially review the current arrangements for market organisation as the current regime is not delivering on its objectives. This is essential in order to deliver a better and more consistent financial return to fishermen and the fish processing sector.

The existing internal organisation of the markets must be adjusted to help address the difficulties experienced by producers in competing against imported products. The CMO legal framework must provide strengthened supports for developing an improved route to market for the seafood sector. New arrangements must take into account each step in the chain from producer, processing, distribution to end-customer for both domestic and export markets and support optimum structures to drive competitiveness and value-adding capability in the EU seafood sector. The arrangements must include a strengthened role and support for Producer Organisations in order to streamline the arrangements between resource management and the market.

Within the CMO, changes are also required in the price support mechanism to allow for immediate response to market failures where they arise. It is also necessary to strengthen the sector by promoting more robust Producer Organisations and their merger with other industry organisations where appropriate.

Ireland considers that Producer Organisations must have a strong role in all aspects of fisheries management so that they are appropriately placed to adapt production in line with demand and thereby maximise the price return to fishermen.

Producer Organisations must be given a strong role in delivering improved, environmentally friendly, fishing methods and the development of recovery and long-term management plans. Funding mechanisms, at a Community level, must be introduced to support this new role.

Marketing standards for fish must be maintained and strengthened.

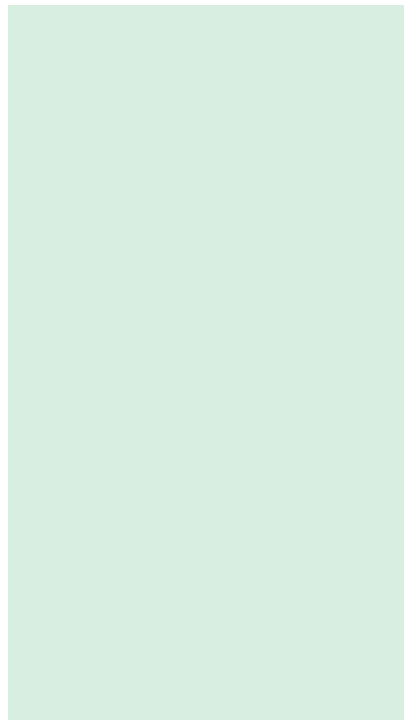
Current labelling requirements are extremely broad and give little useful information to the consumer or indeed the control authorities. Better use must be made of the traceability system introduced under the IUU (1005/2008) and Control Regulation recently introduced. Under these arrangements detailed information is recorded to the retail level and consumer access to this information must be allowed in future. At a minimum, the consumer must know and understand the origin of all seafood products being purchased.

Increased levels and additional new products under Autonomous Tariff Quotas are being progressively introduced and new bilateral agreements with Third Countries are being agreed with

preferential access to the markets granted without regard for the position of community producers and community preference. This policy ultimately discriminates against European fishermen and requires review.

Imports under 'Autonomous Tariff Quotas' should only be permitted where there is a verified shortfall in community production.

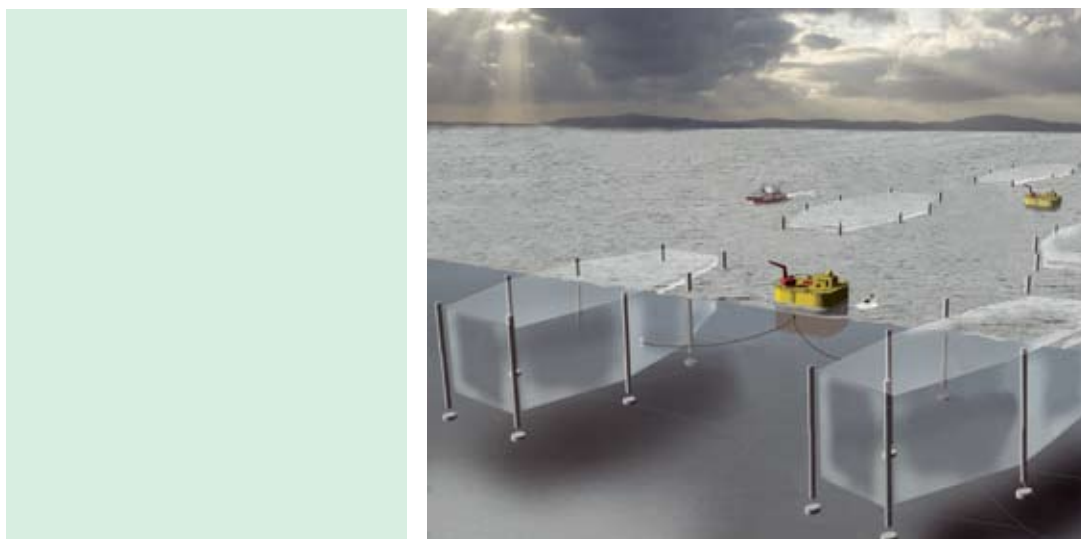
Ireland believes that existing CMO arrangements have the direct impact of forcing down prices for certain products for Community producers which is forcing fishermen to increase levels of landings in order to be economically viable which in turn is undermining the state of fish stocks. The increased level of duty free access being given to individual Third Countries under bilateral agreements for products that are in direct competition with EU product is of concern. The CFP must ensure that Community preference is respected and that European producers and processors, which must apply the high levels of standards, are supported. From a food security aspect it is important that over-reliance on imported fish from third countries - including semi-processed and processed forms - should not militate against the imperative to strategically maintain, in the longer term, the viability and sustainability of Community fishing activities and the processing infrastructure to add value to Community caught fish. The FAO has, in this connection, already underscored the increasing relevance which food security considerations will have in planning to meet future world food requirements against the background of population growth and global warming effects.



5. AQUACULTURE

It is widely acknowledged that world seafood demand will continue growing at a pace which cannot be met by wild fishery products alone; it is also acknowledged that this deficit will be met by aquaculture. Clearly the aquaculture sector offers substantial potential for increased production. Indeed it is possible that, worldwide, farmed production may increase by as much as 50 million tonnes over the next 20 years, reaching 120 million tonnes in 2030 from current levels of 70 million tonnes in 2008.

Ireland's aquaculture production is currently fifth highest of the EU-27 Member States and the FAO predicts that Ireland could see a 61% increase in production by 2030 – the second highest growth level of all European Union Member States. Given an average worldwide growth in the sector is between 6-8% per annum⁴ this potential is significant. The growth potential of Irish aquaculture is further reinforced by the fact that, domestically, the sector contributes just 38% of the value of primary seafood production, while the world wide the figure is closer to 50%.

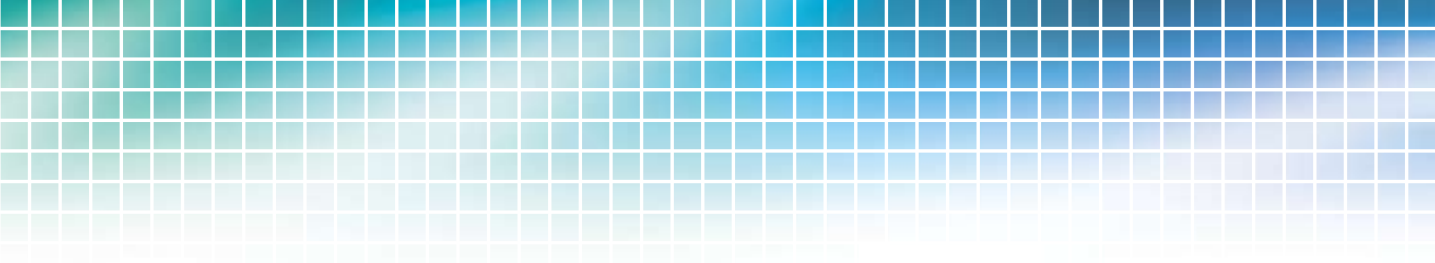


There can be no doubt however that the sector is currently facing challenges. European shellfish markets are under pressure and there remains continued resistance to the rebuilding of the finfish sector where production levels collapsed followed a period of dumping onto the European Union's salmon market; a problem successfully addressed at a Community level. There is also a widespread negative relationship between the sector and the environmental interests. The underlying issues that give rise to this must be addressed and overcome if the true potential of the sector is to be delivered. Set against this backdrop a number of critical issues for the future can be set out:

Ireland strongly supports the vision of European aquaculture set out in the Commission's recent Communication "Building a Sustainable Future for Aquaculture" and concurs with the Commission's judgement that the aquaculture sector has considerable potential and that it is imperative that the challenges causing the current stagnation in output expansion be addressed, so as to unlock the necessary continued development of European aquaculture.

Ireland supports the analysis that a reinvigoration of the Community aquaculture sector is vital, both from the point of view of food security and to redress the current balance of payments deficit arising from the European Union's excessive dependence on imported seafood.

⁴ European Commission: *Strategy for Development of European Aquaculture*



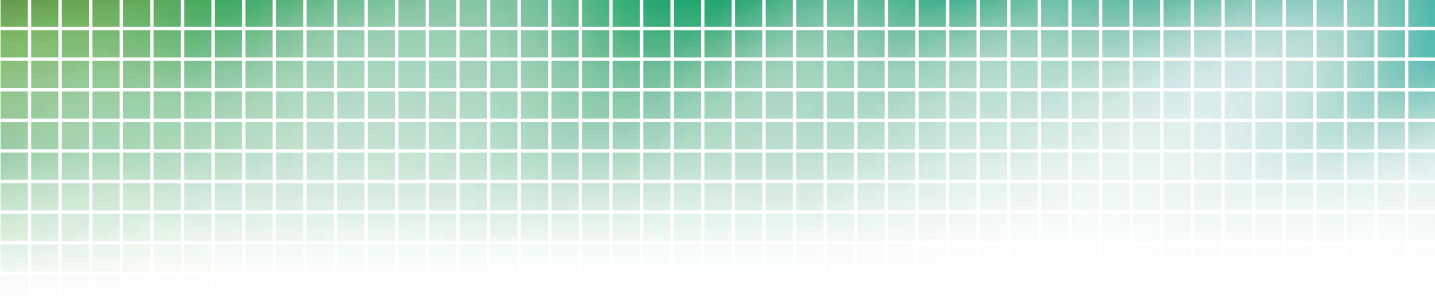
The aquaculture sector offers sustainable opportunities for employment; however the sector must be responsive and adaptable to consumer demands. An analysis of Irish production and employment survey data has shown that every additional 70 tonnes of finfish and shellfish produced generates one full time equivalent job. There is a clear opportunity for the European Union to address two policy objectives through support for aquaculture development: 1) greater food security for the Community and 2) support for coastal communities traditionally dependent on fishing.

Research will play an important role in aquaculture and there should be a focus in this research on areas such as new and market-friendly species and off-shore farming. The European Union should aim to be a leader in this area - Norway for example estimates that it will be producing 400,000 tonnes of farmed cod by 2015. While there has been good investment in research, more is needed and there is an imperative to take a Community approach to such research. For example, Ireland has invested heavily in successfully growing and developing an indigenous farmed cod brood stock, but significant challenges remain in successfully commercialising the activity. There is a need for a European 'investment' approach to research in these areas.

One of the main challenges limiting the development of aquaculture within the EU is the existing negative relationship between the sector and the environmental interests. There is a perception that aquaculture, in all its forms, has a negative impact on the environment and at best can only be tolerated under the most strict and limiting circumstances. This approach has led to a declining sector where the Community market for seafood is being met by third countries like Norway and South East Asia. Ireland strongly believes that aquaculture production must be carried out to the highest standards under an environmentally friendly regime. However, at present there does not appear to be any attempt within the Community to address what appear to be divergent policies on the environment and on food production. The new CFP must set out a road map that establishes a route for the growth of aquaculture production in harmony with Community environmental law.

Ireland stresses the need for ongoing structural supports to be made available to the aquaculture sector. As the sector has stalled within the European Union, it will require financial incentives to maintain a rate of growth consistent with the expansion in aquaculture output seen in other parts of the world. In particular, Ireland would support a special programme of incentives designed to promote the development of offshore, high energy, fish farming in more oceanic conditions than currently practiced. It is recognised that to make such operations financially viable they must be practiced at a very large scale. The level of investment required is likely to be beyond the means of small and medium sized enterprises (SME) and Ireland would support an exemption for such projects from the current restriction on state aid (under the EEF, such aid is restricted to SMEs).

Ireland supports the proposition put forward in the Commission Communication that European aquaculture products should position themselves at the higher value end of the marketplace. This can be achieved through differentiating Community derived seafood from imported products through the use of third-party certified assurance schemes operated to internationally accredited standards (such as EN45011 or ISO65). In particular, Ireland recognises the value of eco-labels and 'organic' certification as a means of differentiating and adding value to Community aquaculture production and would strongly support measures in a reformed CFP which incentivise the development and adoption of such certification processes.



Ireland would support the recommendations put forward in the 2009 Commission Communication regarding the need for more effective communication of the benefits of seafood to the European consumer and in particular aquaculture derived seafood. These communications should concentrate on putting across the health message associated with the consumption of appropriately certified and assured seafood and also emphasise the strategic importance, from a wealth creation and food security point of view, of developing the indigenous Community aquaculture sector. Ireland is of the view that such communications should be coordinated at a central Commission level and also that Member States and their industries should be incentivised to carry out national programmes as well.



Whilst Ireland supports the Commission's view that any development of the Community's aquaculture sector should be environmentally sustainable, it also believes that appropriate generic research should be commissioned at a European level which would demonstrate, from an environmental impact perspective, the essentially benign nature of well practiced aquaculture activity (especially in the case of shellfish aquaculture) in comparison with other commercial uses of the sea. The results of such research should be promulgated to all those concerned with management in the coastal zone in an effort to balance the 'parity of esteem' accorded to the sector and thus boost the perceived legitimacy of aquaculture activity versus other non-fisheries activities carried out in the coastal zone.



6. STRUCTURAL POLICY

6.1 THE FISHERIES FUND

Structural assistance for the seafood industry has been an important element of the Common Fisheries Policy since its inception. The current fund, the European Fisheries Fund (EFF), entered into force on 1 January 2007 and is available to all sectors of the industry as well as to fisheries dependent areas.

The EFF was principally designed to secure a sustainable European fishing and aquaculture industry; to support industry as it adapts its fleet to make it more competitive; to promote measures to protect and enhance the environment; and to help fisheries communities most affected by the resulting changes to diversify their economic base. In particular the EFF focuses on four key areas:

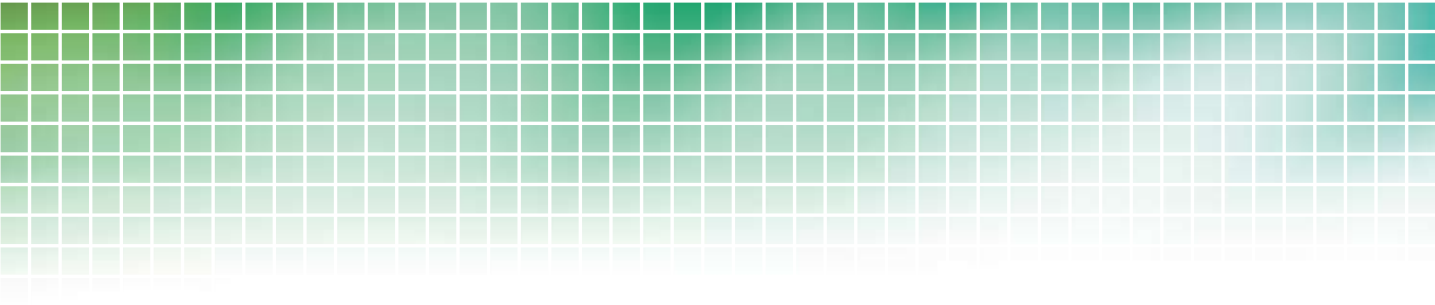
- Supporting the major objectives of the Common Fisheries Policy (CFP), including the sustainable exploitation of fisheries resources and achieving a stable balance between these resources and the capacity of Community fishing fleet;
- Strengthening the competitiveness and the viability of operators in the sector;
- Promoting environmentally-friendly fishing and production methods;
- Providing adequate support to people employed in the sector.

Critically the EFF is intended to better integrate the CFP with other Community policies, particularly environment and employment, and to provide a stronger and more comprehensive strategic approach. The environmental dimension, for example, is reinforced in the EFF through a set of measures that promote selectivity and reduce the negative impacts of fishing and aquaculture on their surroundings. The Fund also seeks to dedicate more attention to human resources by addressing the economic and social needs of the people employed in the sector.

Most importantly, the Fund seeks to address critical issues, particularly fleet overcapacity, that impact directly on the biological sustainability of fish stocks. In doing so, it has recognised that while structural funds alone may not bring a long lasting solution to the problem of overcapacity and, or, biological sustainability, none the less, structural funds, when appropriately and effectively applied, remain a vital tool to help reduce capacity and to mitigate the short-term impacts of conservation measures.

Ireland believes that structural assistance for the seafood industry must remain for the foreseeable future. Like the EFF, the new Fund that emerges to replace the EFF must build on the lessons of the past and be designed as a real tool to deliver sustainability for the fishing industry.

- i) Ireland strongly believes, for example, that aid must be available to promote and accompany the adjustment of fishing fleets to available resources, particularly for those targeting endangered stocks.
- ii) The environmental dimension of Community policy must be reinforced through measures that promote selectivity and reduce any negative impacts of fishing and aquaculture activities on the environment. In addition, support for strengthened environmental compliance should be included.
- iii) The new Fund must pay significantly more attention to the preservation of human resources in the fisheries and aquaculture sector by providing adequate answers to the economic and social needs of the people employed in the sector.

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- iv) Measures of common interest should continue to be encouraged and stakeholders should be supported in their efforts to take initiatives that are of collective benefit aimed at achieving value added over and above traditional individual investments. Measures of common interest should include the promotion of partnerships between scientists, technologists and fishermen, upgrading professional skills, promoting selective fishing gear, developing new markets and strengthening existing ones, combating IUU and ghost fishing, reducing by catches, improving quality and food safety, pilot projects to test innovative technologies, and contributing to the better management of waste treatment.
 - v) Critically, new elements that focus on reducing the energy consumption and carbon emissions of both the production base and the route to market must be introduced.
 - vi) Support should be included for implementation Codes of Good Practice, eco-labelling, and product branding.
 - vii) Continued focus is required for supporting measures that help bring the fleet into balance with available resources. This should include targeted decommissioning schemes.
 - vii) Promoting safety at sea and assisting the industry attain and maintain the highest standards must continue to be supported.
 - ix) Support for the development of aquaculture and processing and measures that improve the quality of products should be retained.
 - x) A higher level of funding to support CFP reform in terms of short-term adverse impacts on operators should also be a key feature of the new Fund.

Ireland considers that all of these must be key elements of any new, post-2013, fisheries fund.

6.2 OTHER COMMUNITY FUNDS.

The second instrument of the CFP encompasses budgetary measures other than those covered by the European Fisheries Fund. This includes conservation, control and surveillance, governance (including expenditure for maritime affairs) and international affairs.

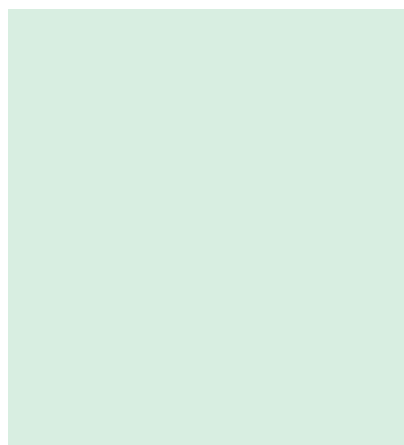
In addition, the Community framework for the collection, management and use of data, the Data Collection Regulation, provides a co-funded common framework to collect basic data and provide the necessary information for biologists and economists. Fisheries research is also provided for, but separately, through the 7th framework programme whilst common market support is delivered through the European Agricultural Guarantee Fund (EAGF);

6.3 WHERE THE FUNDS ARE SPENT.

For the period 2007-2013, the total envelope allocated to the EFF is €3.818 billion, while the total amount for the second instrument is €2.330 billion (this does not include the DCR, EAGF, or 7th Framework). Thus whilst it is clear that the total fund available for fisheries is significant, there remains a concomitant financial burden on Member States to meet all of the demands placed on it by the CFP. This can be particularly true for smaller states with large maritime territories, of which Ireland is one. And no where is this more than true in respect of the second instrument - particularly control and surveillance - and the Data Collection Regulation.

- In 2009, out of a total financial contribution towards Member States' fisheries control, inspection and surveillance programmes amounting to some €30 million⁵ Ireland was awarded €45,000 (0.15%).
- Ireland has been allocated €37.5 million from the European Fisheries Fund⁶ – out of a total of €3.818 billion (<1%).
- In 2009 Ireland was allocated €3.05 million under the Data Collection Framework⁷ out of a total of €41.34 millions (7.4%).

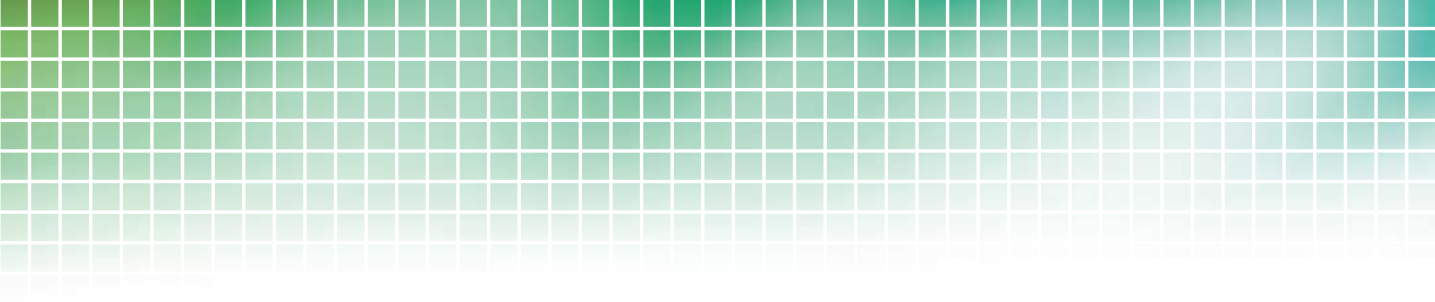
Control and surveillance is a particular case in point. Fisheries control is not limited to checking how many fish a boat has caught. Increasingly, verification and traceability throughout the chain - from the net to the plate - is crucial to ensuring that responsible fishing practices are followed. Likewise as the world's largest single market for fisheries products, the European Union has a particular responsibility in verifying the origin of the fish which it imports. Control and surveillance thus covers issues including quota management and the implementation of technical measures (closed areas, mesh sizes, etc.); inspections to ensure that the fishing gear on board vessels meets official norms and that the information entered in log-books is correct and that fish are not undersized. Such checks are carried out both at sea and in port and Ireland also uses aerial inspections to locate vessels in order to cross-check this information with the data contained in log-books. All of this is hugely costly and involves not just the Sea Fisheries Protection Authority, but also a significant proportion of the resources of the Irish Naval Service and Air Corps. Indeed, it very soon becomes apparent that where a small country (with limited resources) has a very large sea area, then the cost of implementing the CFP rises quickly; indeed a point can be reached where the cost to the State approaches, or may even exceed, the value of the fisheries resources allowed to that Member State under traditional relative stability. In fact the Member State may even find itself funding the implementation of a common policy where the rewards derive, not to its own fishing communities, but to society in another jurisdiction.



5 COMMISSION DECISION of 9 October 2009 on a Community financial contribution towards Member States' fisheries control, inspection and surveillance programmes for 2009 (notified under document C(2009) 7592)

6 COMMISSION DECISION of 28 March 2007 on amending Decision C(2006) 4332 final fixing an annual indicative allocation by Member State for the period from 1 January 2007 to 31 December 2013 of the Community commitment appropriations from the European Fisheries Fund (notified under document number C(2007) 1313) (2007/218/EC)

7 Commission Decision 2009/811/EC on the eligibility of expenditure to be incurred by certain Member States in 2009 for the collection and management of the data needed to conduct the common fisheries policy



Ireland strongly believes that the next reform of the CFP must fundamentally address the cost-benefit imbalance that currently exists at a Member State level in the fisheries sector either through greater allocation of fishery resources or through a more even handed distribution of the funds necessary to implement and enforce the common policy. At a minimum this must include the following:

- i) More targeting of funds towards strengthened controls on illegal fishing and IUU activity including support for the operational cost of such activity and the management of resource;
- ii) More resources allocated to scientific research to improve knowledge of resources;
- iii) New innovative price support mechanisms established within the EFF.



7. THIRD COUNTRY AGREEMENTS AND NEW MEMBER STATES

Third Country Agreements are an integral part of the European Union's fishing landscape. These agreements are important as they enable an efficient maximisation of fishing opportunities across the Community's fleets as a whole. They can be separated into two categories, Northern Agreements and Southern Agreements. A key aspect of both is the exchange of fishing opportunities; this involves the use of financial payments in respect of the Southern agreements while the Northern agreements revolve around an actual exchange of quotas. Additionally the agreements allow for the joint management of stocks, setting of overall TAC levels, long-term management plans etc.

It is noteworthy that in this review of the CFP the Commission appears to concern itself solely with Southern Agreements and the influence the CFP can have on improving the fishery sustainability and the socio-economic conditions of the partner country.

Ireland strongly believes there is also an urgent need for a review of the process for determining the exchange in fishing opportunities entered into in the Northern agreements. The transfer of fish stocks to Norway, for example, is done at a Community level. This sees 'payment' to Norway – a resource transfer - based on the relative stability share of Member States in the stocks of interest, whereas, the apportionment of the transfer of opportunity back to the Community from Norway is based on a historical track record of Member States. Thus we find that the net contribution of some Member States is disproportionately large. For example, important pelagic species form an integral part of the transfer to Norway, this results in some Member States paying a disproportionately high price vis-à-vis the level of benefits they receive. This was finally and formally acknowledged by the joint Council and Commission statements at the December 2009 Council meeting. In particular statement no 17 states:-

“Bearing in mind that Member States benefit to a different degree from the exchange of fishing opportunities with Norway, the Commission shall endeavour to ensure that the costs and benefits for individual Member States of the annual arrangements with Norway should be as balanced as possible.”

Ireland, as with some other Member States, has historically been a net contributor to the balancing arrangement; this is an unfair and unequal situation and against the tenet of the Treaty of Rome which espouses an even handed treatment for all Member States. Therefore in the interests of fair play Ireland seeks a reconstituted process wherein all Member States contribute commensurately to the level of benefits they accrue.

In the context of accession negotiations with candidate countries- especially those with important fishing interests - the new policy must deliver equity of treatment for both existing Member States and applicants. It is particularly important to ensure that the costs and benefits for individual Member States should be balanced.



8. MANAGING FOR THE FUTURE IN A REFORMED CFP

8.1 REGIONALISATION: FOCUSING DECISION MAKING ON LONG-TERM PRINCIPLES

The existing decision making processes within the CFP has been substantially set at Council level and this has led to an inflexible and cumbersome system. Too often, the current system means that decisions that relate to regions are seen as being made remotely from the operators and relevant coastal communities. In addition, the process has the impact of determining detailed arrangements which are applicable across Community waters but without the capacity to take into account the specificities of fisheries or regions. This situation is further compounded with the expansion of the European Union and Ireland has a role in developing and supporting management plans in, for example the Baltic Sea, an area of which it has little if any experience.

While a clear need for change exists, any changes to the current policy must, however, ensure that new arrangements do not merely create another expensive layer of bureaucracy. On the contrary the scope, function, powers and administration of any new structures must respect basic principles; for example promoting the simplification of management arrangements while delegating decision making to the lowest level appropriate with the Treaty provisions. The management of fisheries will be strengthened if new structures deliver arrangements that give industry and other stakeholders a strong and active role in developing and implementing plans for the seas and fisheries that they know and are dependent upon.

Ireland supports a more regional and holistic approach to management where responsibilities are clearly established with the overarching policy established by the Council and Parliament, detailed arrangements set by the Commission in association with regional Member States and stakeholders, and detailed implementation is delegated to relevant Member States in association with stakeholders. Taking account of the legal roles of institutions, we see a framework developed along the following lines:

- i) Objectives, overarching policy, framework and safeguards should be set by the Council / Parliament for a region or type of fishing.
- ii) Multi-annual plan should be brought forward by the Commission in association with Member States and stakeholders with a significant interest therein. This process could involve establishing, on an informal basis, a 'Forum of Regional Fisheries Ministers' who would advise the Commission on options for the development of multi-annual plans. The objective of this new advisory forum would be to assist the Commission in bringing forward the most appropriate plans and measures for the region. The views of the Regional Advisory Councils would also be taken on board so that the Commission will be fully informed in advance of bringing forward new proposals.
- iii) Implementation arrangements should be adopted by relevant Member States in association with stakeholders subject to oversight by Commission.

The structure, operation and performance of the existing Regional Advisory Councils should be reviewed against their existing mandate to assess whether and how their role could be strengthened so that they will have a better ability to play a more active and effective advisory role in future management arrangements.



8.2 INCREASING INDUSTRY RESPONSIBILITY.

The current CFP is based on a top down, detailed control model where it is assumed that fishermen will act irresponsibly unless they are scrutinised and supervised on a constant basis by the Member State and, or the Commission. It is clear that strong, effective, transparent, and equitable fisheries control and enforcement will continue to be a necessary feature of any new CFP. However, this approach on its own has given little incentive to the fishing industry to play a constructive role in the CFP and any new policy must motivate the fishing industry to take greater direct responsibility for the rebuilding and sustainable management of fish stocks.

Responsible fishing schemes have recently begun to play a role in helping stocks to recover. Such schemes involve governments and industry working towards long-term management objectives in fisheries. Some recent examples of this approach have demonstrated that simple measures can have substantial benefits when they are supported by the industry and the benefits are clearly recognised on the ground by the operator.

It is vital that responsible fishing schemes are introduced and provided with sufficient incentive, including increased quotas.

Clearly a regional approach to management will increase the direct role of operators in decision making. There is opportunity for, over time, moving detailed management arrangements of fisheries, within a clearly defined management plan, directly to operators through Producer Organisation or other appropriate representative organisation. This could operate through a system whereby options for delivering defined targets are left to industry. The industry representatives of all relevant Member State, perhaps working through the RAC structures, would determine for example closed areas, mesh size, fishing seasons, maximum discard levels for a fishery. This type of results based management would give responsibility back to fishermen but subject to appropriate safeguards being put in place so that where key deliverables have not been delivered, appropriate actions are taken at Member State/Commission level. This system would support maximising the economic returns for fishermen where quality and supply are matched more closely with market requirements. This policy would also need to be actively linked with promoting a culture of compliance within the industry where the industry itself would take a more active role in promoting good practice.

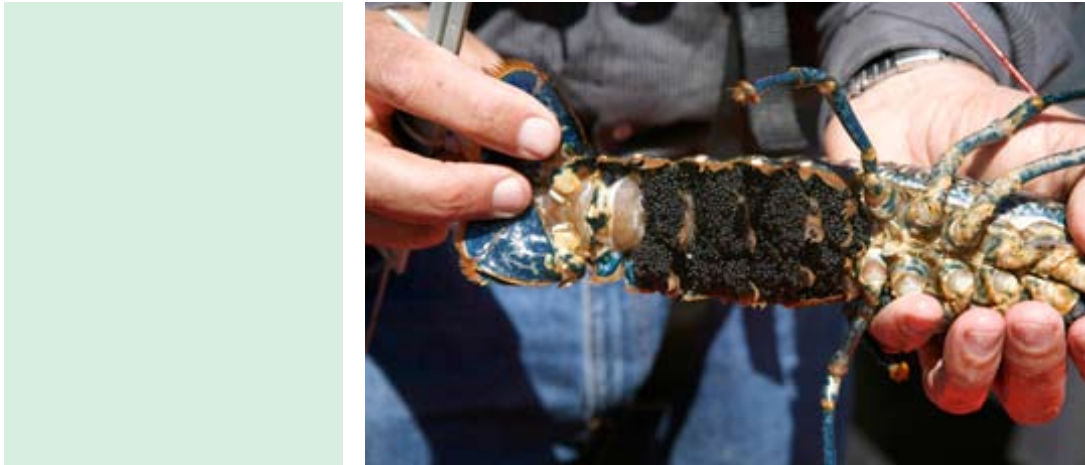
8.3 DEVELOPING A CULTURE OF COMPLIANCE.

Under the terms of the new control regulation, adopted at the EU Fisheries Council in October 2009, implementation is phased over a number of years. Thus, it will take time to determine the effectiveness of this regulation and the possible need for further strengthening of the control regime.

Ireland has a heavy burden of responsibility for the control of fishing activity within the rich fishing grounds inside its 200 mile EEZ. Ireland considers that there is need to take additional initiatives to strengthen the effectiveness of control and to further promote a level playing field in control across the Community.

Control measures conducted at sea are generally hampered by practical issues that arise from the cramped conditions frequently encountered when conducting these inspections of fish storage rooms.

Ireland recommends that the requirement to store certain species separately should be extended to species not subject to multi-annual plans. This would increase the effectiveness and ease of the inspection of catches at sea. Ireland also recommends the introduction of an additional requirement to store catches made outside Community waters from those made inside the 200 mile limit.



Under the current CFP, it is not possible for the regulatory authorities in the different Member States to access up-to-date information on the uptake of Total Allowable Catch (TAC) entitlements by other Member States and to entitlements of individual fishers to a portion of their national TAC. As there are a number of different systems in place to distribute national TACs in the different Member States it is not possible to know whether an individual fisher is entitled to one or more quota species and where they have an entitlement what the actual limit (kg) of the entitlement is. One effect of this lack of information is to prevent the application of a risk management approach for selecting individual fishing vessels for inspection as laid down in Council regulation 1224 of 2009 (Title II, Article 5).

With the emergence of Electronic Reporting Systems (ERS), required on the larger fishing vessels from January 2010, there is an even stronger case for systems that facilitate the routine exchange of detailed information on the entitlements of individual fishers.

Routine exchange of detailed information on the entitlements of individual fishers is a critical issue for Ireland as a significant portion of the EU's commercial fisheries take place within Ireland's economic zone (EEZ) and these fisheries are exploited by fishing vessels from many Member States. The current lack of real-time information contributes to the perception, by Irish fishers, that there is not a level playing field when it comes to the application of the CFP.

DG MARE conducts missions to all coastal Member States to evaluate compliance with the CFP. These missions have been made more effective over recent years through the adoption of more defined mission protocols but there remains the issue of a lack of transparency regarding the mission reports.

In order to promote a level playing field and confidence in the control systems in operation across the European Union, the Commission should make available publicly the audit/control reports carried out by the Commission on the controls within Member States.

An example of good practice can be seen under the audits undertaken by DG SANCO⁸. Following completion of a mission the Food and Veterinary Office exchanges a draft report with the Member State being evaluated; thereafter it produces a final report and the latter is published openly on the FVO website. These reports are accessible to all Member States and provide transparent information

⁸ Missions to Member States and 3rd Countries conducted by veterinary inspectorate - Food and Veterinary Office (FVO).



on the relative application of Community Food Safety law. There is no equivalent transparency for evaluations carried out by DG MARE on the application of Community Fisheries law. This leads to a strong perception that there is unfairness regarding the application of the CFP within the Community. This in turn undermines the commitment to compliance generally.

The current lack of transparency in respect of evaluations carried out by DG MARE on the application of Community Fisheries law must be addressed.

8.4 INTEGRATING MARITIME POLICY

It is now fully recognised that the fisheries sector interacts closely with other maritime sectors. A future CFP must strive to better understand these interactions and move away from stand-alone 'sectoral' management towards a more holistic, integrated, 'ocean management' approach.

The Integrated Maritime Policy (IMP), launched in 2007, addresses these interactions between all European policies and maritime affairs. This shift in approach involves moving towards an Ecosystem Approach to Marine Management (EAMM): the Ecosystem Approach to Fisheries Management (EAFM) is a major step in this direction.

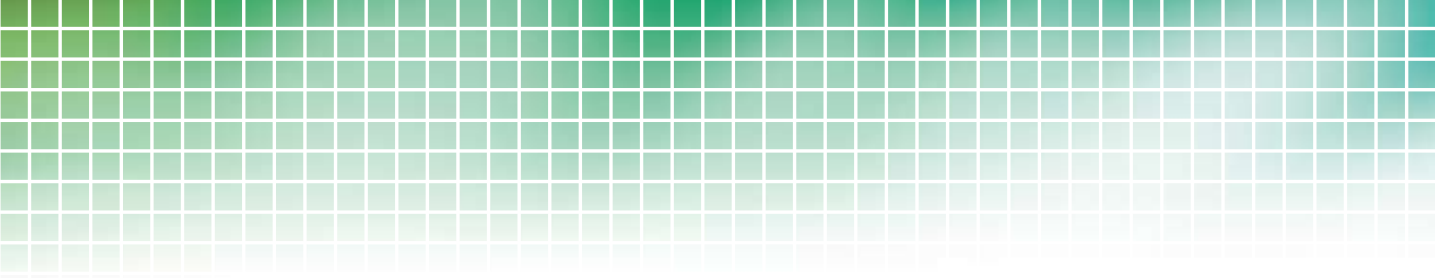
The Marine Strategy Framework Directive (MSFD) is the environmental pillar of the Integrated Maritime Policy and sets the obligation on Member States to achieve 'Good Environmental Status' by 2020. Ireland is of the view that the reformed CFP must support the Marine Strategy Framework Directive through the implementation of an Ecosystem Approach to Marine Management.

Ireland believes that the Integrated Maritime Policy will make a substantial contribution to alleviating socio-economic consequences of reduced fishing capacity and reduced fishing opportunities. Coastal community development cannot be addressed by the CFP alone but must be seen as a wider undertaking within the context of the Integrated Maritime Policy as well as European environmental and structural policy.

8.5 CLIMATE CHANGE AND RELATED IMPACTS ON THE CFP

There is clear scientific evidence and broad acceptance that climate change is a reality; global atmospheric concentrations of greenhouse gases - carbon dioxide, methane and nitrous oxide - have greatly increased as a result of fossil fuel use. This has led to warming of the atmosphere and oceans, acidification of sea water, and changing wind patterns. As greenhouse gas emissions continue to rise, so too will the global temperature, leading to further melting of ice caps, rises in sea levels and changing weather systems. These climate changes will also affect ocean currents, which in turn will impact on the distribution and abundance of marine life, particularly plankton and fish. Ireland fully accepts that climate change will impact, to some degree, the marine environment and the animals that live there in the future. Marine ecosystems are already under pressure from pollution and over fishing and will be further impacted by warmer temperatures and acidification. The debate at this point is largely focused on the level, extent, specific nature and localised effects of the overall climate change patterns on the North East Atlantic.

There are five main areas where the CFP review needs to consider climate change and its related challenges. The first of these relates to fisheries management. Clearly stocks which are both sensitive to climate change and heavily fished will have to be managed in a new way: not only must these stocks be rebuilt but rebuilt to a level that also provides them with the necessary resilience to withstand future climate change impacts. In addition to biomass impacts, climate change may also modify geo-spatial distribution; this too will have management consequences.



Secondly, heightened awareness of the consequences of the over reliance on fossil fuels will, inevitably, drive up the price of these fuels and, perhaps, also limit their availability. Rising real fuel costs will, in turn, impact on both the viability and ways in which the oceans are harvested. A cogent example of this is the recent, 2008, spike in fuel prices. This proved to be one of the biggest challenges facing the fishing industry in recent times. Fisheries are a fuel intensive industry, consuming significant quantities of oil and as such are extremely sensitive to price volatility. The International Energy Agency recently predicted that the output of conventional oil will peak in 2020 if oil demand grows on a business-as-usual basis. Clearly the implications of higher fuel prices will need to be considered in this review of the CFP. This means decreasing dependency by the sector on oil, encouraging greater use of alternative fuel sources, introducing mitigation strategies etc.

Reducing dependence on fossil fuels within the seafood sector generally - and coping with higher prices - will require substantial investment in research and technical assistance. This research and technical support must focus, principally, on propulsion systems, ship design, fishing gear design as well as fishing techniques. The objective should be to cumulatively reduce the fossil fuel requirements of the sector whilst still harvesting the maximum sustainable yield from Community waters to feed European consumers.

The third affect of climate change and related energy cost concerns, is the need to re-think the geo-spatial pattern of fishing. In this context there must be a greater emphasis on reducing fuel consumption by landing to ports nearest to where stocks are located. Many vessels currently travel long distances from, for example, Norway, the North Sea or the Bay of Biscay to harvest the resources of the western waters. Those vessels then carry their catches long distances by sea returning to their distant home port. This long distance fishing pattern will, inevitably, become less viable as fuel prices rise. The fleets harvesting resources in the western waters will increasingly need to relocate to ports close to the fishing grounds for at least part of the year. To assist this process the Common Fisheries Policy must endeavour to ensure that landing infrastructure and logistical support is available to European fleets in Member States' ports proximate to major fishing grounds. Such action will clearly improve the competitiveness and sustainability of the Community seafood sector as a whole.

Fourthly, climate change and carbon footprint concerns will inevitably impact on trade inflows of seafood products from distant parts of the globe to European seafood markets. These factors, and the allied environmental concerns, should focus Community support and assistance towards the development of a larger, sustainable, environmentally friendly, European aquaculture industry. Such a move would quickly reduce the present European seafood markets reliance on imports from distant parts of the globe.

Finally, Ireland is the central location where the North Atlantic Drift (NAD) begins to impact on the European coastline. The strength and direction of this vital ocean current is a major factor impacting Europe's marine and terrestrial climate. Any changes to the North Atlantic Drift will have major impacts on every aspect of European life, including European marine and terrestrial food production. Ireland has already begun to work on deploying marine data gathering devices to study and create a sentinel monitoring system for North Atlantic Drift variations. There is now an urgent need for a European supported development of an integrated, North East Atlantic, monitoring system. This must combine temperature, current, and atmospheric data with correlated analysis of fish stock trends and developments in the relevant areas of the North East Atlantic. Such a move would prove an invaluable tool for both monitoring and preparation for climate change impacts on Europe. The substantial funding needed for this multi agency, multi-state initiative should be via a co-ordinated Common Fisheries Policy – Integrated Maritime Policy initiative at EU Level. This will ensure that the information which can be gleaned from the fisheries knowledge of trends in relation to living marine organisms is allied to oceanographic and atmospheric data to provide an integrated picture of overall marine climate change effects impacting on Europe.

8.6 FOOD SECURITY, THE CFP REVIEW & EU FOOD POLICY

Any review of a major food production policy within the EU, such as the CFP review, must place global and EU food security concerns at the centre of that examination. Between now and 2050 the world's population will rise by a third and ensuring an adequate sustainable protein supply to the global population is one of the greatest challenges facing mankind. The FAO estimate that the number of malnourished people in the world rose to over 1 billion people in 2009; facing this growing challenge must be addressed in the context of the CFP Review.

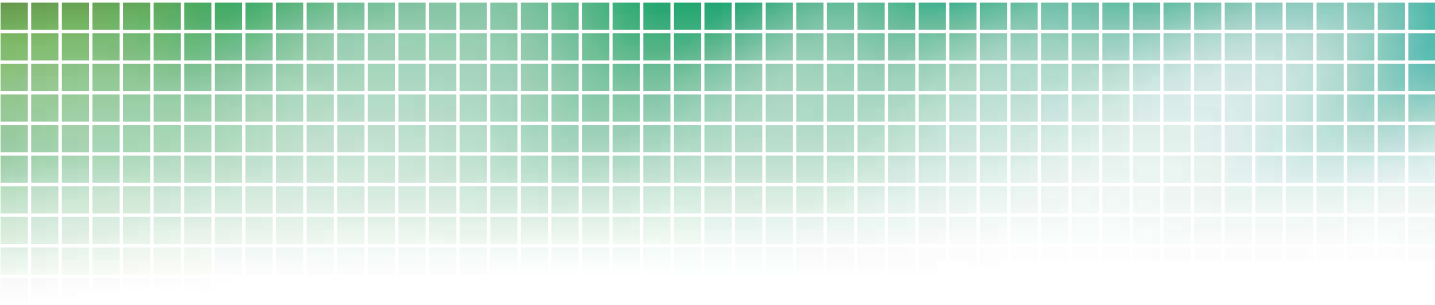
Globally, fish provides more than 2.9 billion people with at least 15 percent of their average per capita animal protein intake. The FAO reports⁹ that the contribution of fish to total animal protein intake was 18.5 % in 2005 and that the true figure is probably higher. Trends in EU seafood demand, trade policy, and domestic production however have resulted in European consumers becoming 70% dependant on imports for their seafood supply. Many of these imports come from distant locations where the energy and climate change costs may, over the next decade, question the sustainability of these trade patterns. In addition, it may not be possible in the medium-term to sustain the current harvest levels in many of the fisheries from which the EU market is increasingly drawing in its import supply. Finally, growing food needs and domestic demand for seafood in the countries which are now exporting to the EU market may diminish the flow of imports to the EU market in the medium-term.



The FAO has projected that fish consumption in the EU will rise by 9% between 2005 and 2030. The average per capita consumption by the 28 countries (EU plus Norway) will move from 22 kg per capita per year in 1998 to 24 kg per capita per year in 2030. The two additional kilograms per capita signify that the net supply to the EU market will have to increase by 1.6 million tonnes (an additional 1.1 million tonnes to meet the growth in per-capita consumption and a further 550,000 tonnes to satisfy the projected 22 million increase in population over the period).

Maintaining current levels of supply and supplying an extra 1.6m tonnes of seafood to the European seafood market poses many challenges for Europe. It is unlikely that it will be either a viable or acceptable policy for the Community to simply seek to source this supply from increased imports from capture fisheries where supply limits are reached or where supply is already declining. To do so would undermine the supply of seafood to those in traditional domestic markets outside the Community.

9 FAO: the state of world fisheries and aquaculture 2008



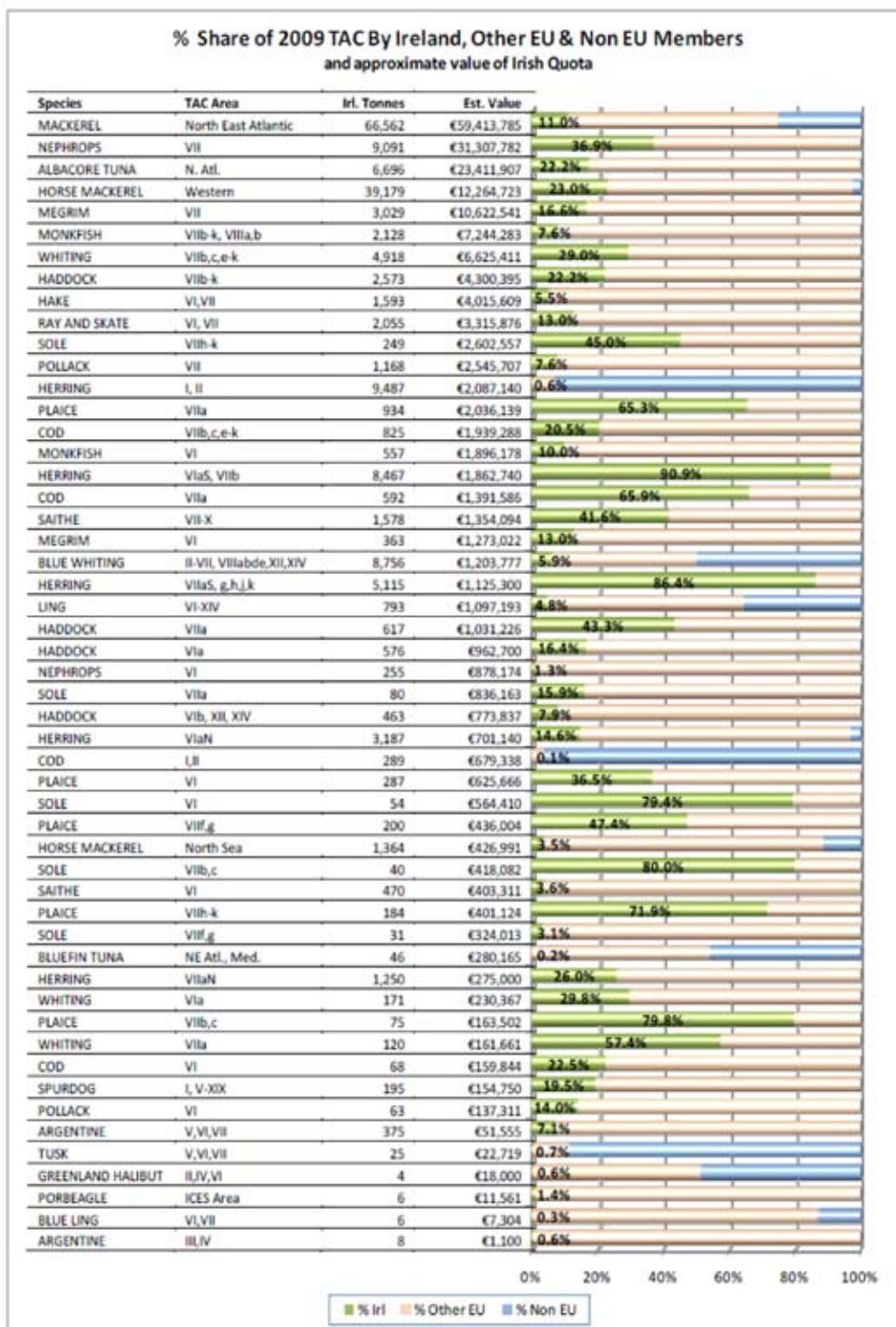
To minimise these imports concerns, the revised CFP needs to do a number of things. Firstly, it must ensure that Community fisheries are managed sustainably and fish stocks are rebuilt to maximise domestic supply. Secondly, the CFP must enable the Community's fleets (through its support, markets and development policies) to fish sustainably and trade competitively in the EU market with imports that may be neither sustainable nor available to the EU market in the medium-term. Thirdly, the CFP must provide enhanced support for the application of knowledge and technology to the fishing sector, so that it can fish 'smarter' and more competitively while at the same time reducing its energy impacts, wastage and discards. Finally, the European Union, across all areas of policy, must embrace a much more active and developmentally oriented aquaculture policy which drives forward increased production of sustainable, high quality seafood which can compete successfully with less secure aquaculture imports currently flowing into the European Union's seafood market from distant parts of the globe.

A reformed CFP cannot allow its domestic seafood production sector to shrink and become less competitive while it pursues resource based biological sustainability as a sole or primary objective whilst simultaneously depending more and more on cheap imports to meet growing demand for seafood in the home market.

A continuation of that policy focus within a narrow fisheries policy will not serve the Community objectives or obligations in relation to global and domestic food security over the period envisaged by the CFP reform.

The reform process must actively align with other policy areas, particularly trade policy, to ensure that there is a vibrant, competitive, sustainable European Union seafood production sector which maximises sustainable Community seafood production and contributes to the Union's and global food security objectives throughout the 2012 – 2020 period.

IRELAND'S PROPORTIONAL SHARE OF THE TAC STOCKS OF THE MAN COMMERCIAL SPECIES IN ORDER OF LARGEST VALUE



Values are based on 2008 average price per tonne.



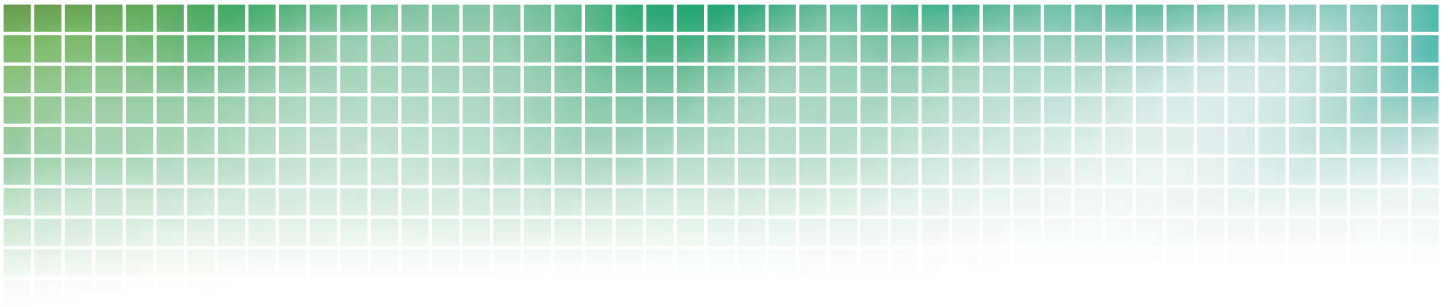
9. APPENDIX

Submissions on Ireland's response to the Commission's Green Paper on the Reform of the Common Fisheries Policy were received from the following organisations and individuals.

- Brendan Connolly
- Comhar Iascaire Éireann Teo
- Comhar na nOileán Teo
- Environmental Pillar of Social Partnership
- Federation of Irish Fishermen
- Fianna Fáil MEPs – Pat the Cope Gallagher, Brian Crowley and Liam Aylward
- IFA Aquaculture
- IIEA (Institute of International & European Affairs)
- Irish Fish Processors and Exporters Association
- Irish Fishermen's Organisation
- Irish Inshore Fishing Association
- Irish Wildlife Trust
- Joint Committee on European Affairs & Joint Committee on Agriculture, Fisheries and Food
- Pat Murphy
- People's Movement
- Sea Fisheries Protection Authority

This report and all of the submissions received are available on www.fishingnet.ie







Department of
Agriculture, Fisheries and Food
An Roinn
Talmhaíochta, Iascaigh agus Bia